National Park Service U.S. Department of the Interior

National Park Service Pacific West Region



FINDING OF NO SIGNIFICANT IMPACT

REPLACEMENT OF PIER AT BECHERS BAY

CHANNEL ISLANDS NATIONAL PARK, CALIFORNIA

The National Park Service (NPS) will replace the existing pier at Bechers Bay on Santa Rosa Island in Channel Islands National Park. The purpose of this action is to provide a structurally sound pier at Santa Rosa Island in a manner that provides safe and dry vehicular and pedestrian access to the island for park visitors and staff, that is compatible with the character of the historic ranching district, that protects the area's natural resources, and that best serves park operations. The pier provides for approximately 700 vessel landings per year and offers the only safe and economical means of delivering large quantities of materials and supplies to the island.

A new pier is needed at Bechers Bay because over the past several years it has suffered corrosion from the marine environment and deterioration from storms and overall use and has consequently required temporary repairs (which is no longer deemed a viable option). In May 2002, two bents (rows of piles) of steel piles supporting the pier collapsed near the shoreline. Emergency repairs were completed in June 2002 to keep island access operational. The pier had a lateral failure in December 2003 due to piling deterioration. Emergency repairs began in January 2004, and as of November 2006 all piles had been replaced. These emergency repairs only provide for an additional 5 years of service. If the pier is not replaced or rehabilitated, another failure could occur. Loss of the pier would result in loss of boat access to the island, which could lead to closure of the island for all but essential operations due to the cost of air transportation to the island and its inaccessibility by air during winter months. Closure of the pier would severely impede park operations and curtail visitor access. In addition, the pier's degraded condition and current configuration has created safety concerns for both park staff and visitors.

The NPS completed an environmental assessment (EA) that provides an analysis of the potential environmental consequences of the alternatives considered for the rehabilitation or reconstruction of this pier. The EA was prepared in accordance with National Environmental Policy Act of 1969, as amended (NEPA), its implementing regulations by the Council on Environmental Quality (40 CFR 1500-1508), and Director's Order #12, Conservation Planning, Environmental Impact Analysis and Decision-Making, and accompanying Handbook (DO-12). The original EA released for public review and comment has been modified in response to minor comments received; these changes are documented in Errata sheets prepared as a technical supplement to the EA. The EA and Errata together constitute the full and complete record of conservation planning and environmental analysis completed for this project.

SELECTED ALTERNATIVE

The NPS has selected the preferred alternative as presented in the EA (Alternative B – New Pier on Existing Alignment) as the course of action to be implemented. The selected actions include demolishing and replacing the existing historic pier. There are no substantive changes incorporated in Alternative B due to public comment or agency consults. The replaced pier is expected to provide for a 20- to 25-year life span before the first major maintenance activities are necessary.

The new pier will generally remain within the original footprint of the existing pier at the existing 574-foot length. Approximately 62 24-inch support piles and 46 18-inch fender piles will be installed. Geotechnical evaluation has concluded predrilling will be required for installation of piles. An outer easing 30 to 36-inches in diameter will first be placed into the surficial sediments and the pile holes will

be drilled inside the casing. The casing protects water quality by preventing drill cuttings and fine material from entering the water column. The casing will be oscillated if necessary to embed it in the surface material. The casing will not be driven. The hole for the pile will then be drilled into the substrate using an auger drill bit. Auger drill bits use hardened carbide steel teeth to advance the hole using a cutting or scraping action, as opposed to hard rock drill tips which progress by grinding rock into a powder. Cuttings will not be discharged back to the ocean. Solid cuttings will be removed from the drilled hole and stock piled in a previously disturbed site within ½ mile from the pier to be used by the park (location to be determined by the park's Contracting Officer). The pile will then be placed in the drilled hole and grouted with Portland cement grout pumped into the bottom of the hole. Piles will be placed at a depth of approximately 15 feet below the surface of the substrate. No pile driving will occur. The casings would be typically left in place for one to two days so that fine suspended material in the water inside the casing has time to settle to the bottom. Once the pile is set, the casing will be removed by lifting it out of the surface material. The support and fender piles will be placed at a depth of approximately 15 feet (respectively) below the surface of the substrate.

The height of the pier will be increased from 16 feet to approximately 23 feet above the mean lower low water mark (MLLW), which will be out of the expected storm surge. The pier height will have a uniform slope transition from 23 feet to 28 feet where it will connect to the shore at an elevation matching the original pier elevation. This will be in compliance with accessibility requirements. The new pier will be designed to withstand industrial loads, creating a flat deck and eliminating the need for wheel load runners. It is estimated that a construction season of six to seven months will be required to construct the new pier.

The new pier will have four platforms to provide access from boats to the pier. Two platforms will be located on each side of the pier, with the lower of the two platforms located closer to the shore, and each pair of platforms connected by stairs. Access for limited mobility individuals will be provided by a pier personnel crane that is operated by a certified mobile crane operator and that will lift the visitor from the concessionaire boat in a lifting basket to the pier.

The end of the pier, where loading and unloading occurs, will be widened from 40 to 50 feet, but the remainder of the pier will be 20 feet wide. The original A-frame hoist and support cables will be removed from the pier head and relocated to the shore for visitor interpretation. A 100-foot fender area will be provided along the north side of the pier where the NPS unloads supplies and equipment and a 50-foot fender area will be provided on the south side of the pier for concessionaire boat access. A 20-foot fender pile will be provided along the end of the pier.

Stormwater runoff running down the dirt roadway towards the pier deck will be captured and discharged in accordance with best management practices for handling of stormwater runoff. Disturbance of the existing roadway will be largely confined to the 15 feet immediately adjacent to the pier connection to the land, and impacts minimized beyond this local area. A new trench drain will be installed on the land side of the pier structure. Gravel or other energy dissipating material will be placed on each side of the road. These gravel-lined swales will deliver water downhill towards the trench drain to help control erosion.

The staging area for construction will be located on the bluff above the pier in a previously disturbed area that has served as the staging area for past pier maintenance and refurbishing projects. To facilitate the transport of materials and equipment needed for the construction of the new pier, the existing road that provides access from the pier to the park's road system will be improved through limited grading and the addition of some fill to level the approach to the pier.

During pier construction, construction crews will remain on site during the work week to maximize their available time on the island. Crews will stay in one or more locations, including within the bunkhouse at the ranch (if space is available), on crew boats moored offshore from the pier, or in temporary contractor housing facilities located in previously disturbed areas on the island. No new facilities will be constructed or new areas disturbed.

OTHER ALTERNATIVES CONSIDERED

The environmental assessment prepared for this project also analyzed the no action alternative (Alternative A), an alternative that proposed rehabilitating the existing pier (Alternative C), and an alternative that proposed to construct a new pier on adjacent alignment (Alternative D).

Alternative A - No Action Alternative

Under the no action alternative, the current configuration of the pier would remain the same. The pier would remain at its current length and width of approximately 574 feet and 20 feet, respectively. The pier head would remain as a widened section approximately 60 feet long and 40 feet wide with a 24-foot by 20-foot offset extension. The original A-frame hoist and related cables that were used for many years to load and unload cattle would remain in place. The pier would continue to stand 16 feet above the MLLW. Access from concessionaire boats to the pier for visitors would continue to be via ladders positioned along the south side of the pier. The NPS would continue to off-load supplies and equipment onto the pier on the north side. Under the no action alternative, regular repair and maintenance activities, such as replacing pilings, patching decking, and replacing handrails would continue to keep the pier safe and serviceable. The no action alternative was not chosen as the NPS preferred alternative because it did not meet the overall purpose and need for the project.

Alternative C - Rehabilitation of Existing Pier

Alternative C would retain the existing pier structure instead of constructing a new pier. All existing piles would be replaced with new protective coated steel piles of greater diameter. Existing pile caps would be reused. Geotechnical evaluation has concluded predrilling would be required for installation of piles. Predrilling would be specified to be performed with an auger, with a requirement to minimize removal of materials from the predrilled hole. Piles would be driven to required depth through the column for predrilled fractured rock, and then post grouted to provide required strength. Post grouting would be performed with Portland cement grout formulated with anti-washout agents, and grouting would be limited to zones 5 feet and below the seabed floor to minimize potential for deposition or unintended flow of cement grout beyond the extent of the drilled hole.

The pier would have a length of 574 feet, as currently exists, and would retain the existing deck elevation of 16 feet above MLLW. The original A-frame hoist and support cables would remain for visitor interpretation.

New piles would be driven in order to construct four access platforms: two new platforms and stairs on each side of the pier. Access from the boat to the pier would be provided by these new platforms and stairs. Access for limited mobility individuals would be provided by a pier personnel crane that is operated by a certified mobile crane operator and that would lift the visitor from the concessionaire boat in a lifting basket to the pier. The existing timber deck would be removed during construction and replaced after installation of the new piles. New fender piles would replace the existing piles, and additional new fender piles would be driven on the east side. It is estimated that a construction season of six to seven months would be required to construct the new pier.

Stormwater runoff running down the dirt roadway towards the pier deck would be captured and discharged in accordance with best management practices for handling of stormwater runoff in the same manner as Alternative B to help control erosion.

As with Alternative B, the staging area for construction would be located on the bluff above the pier in a previously disturbed area. The existing road that provides access from the pier to the park's road system would be improved through limited grading and the addition of some fill to level the approach to the pier.

During pier construction, construction crews would remain on site during the work week to maximize their available time on the island. Crews would stay in one or more locations, including within the

bunkhouse at the ranch (if space is available), on crew boats moored offshore from the pier, or in temporary contractor housing facilities located in previously disturbed areas on the island. No new facilities would be constructed or new areas disturbed.

It was projected that approximately 10% of the deck would need to be replaced on a yearly basis due to continued storm surge damage.

Alternative C was not chosen as the NPS preferred alternative because it did not meet the overall purpose of the project as well as Alternative B. While the rehabilitation of the pier as proposed under this alternative would improve public safety, obstacles to people with limited mobility would remain. Also, retention of the existing deck elevation that is below the highest storm surges would continue to pose a safety hazard as well as maintain exposure of the pier to destructive wave impacts and overtopping.

Alternative D - New Pier on Adjacent Alignment

Under Alternative D, a new pier designed to the same specifications as described in Alternative B would be constructed southeast of, and parallel to, the existing pier to allow the existing pier to remain in service during construction. Geotechnical evaluation has concluded predrilling would be required for installation of piles. Predrilling would be specified to be performed with an auger, with a requirement to minimize removal of materials from the predrilled hole. Piles would be driven to required depth through the column for predrilled fractured rock, and then post grouted to provide required strength. Post grouting would be performed with Portland cement grout formulated with anti-washout agents, and grouting would be limited to zones 5 feet and below the seabed floor to minimize potential for deposition or unintended flow of cement grout beyond the extent of the drilled hole.

The rock abutment where the pier adjoins the island would also need to be cut to accommodate the new alignment of the pier. Once the new pier is completed, the A-frame hoist and support cables would be removed to the island for interpretation and the remainder of the old pier would be demolished. It is estimated that a construction season of six to seven months would be required to construct the new pier.

Stormwater runoff running down the dirt roadway towards the pier deck would be captured and discharged in accordance with best management practices for handling of stormwater runoff as under Alternative B to help control erosion.

As with Alternative B, the staging area for construction would be located on the bluff above the pier in a previously disturbed area. The existing road that provides access from the pier to the park's road system would be improved through limited grading and the addition of some fill to level the approach to the pier.

During pier construction, construction crews would remain on site during the work week to maximize their available time on the island. Crews would stay in one or more locations, including within the bunkhouse at the ranch (if space is available), on crew boats moored offshore from the pier, or in temporary contractor housing facilities located in previously disturbed areas on the island. No new facilities would be constructed or new areas disturbed.

As with Alternative B, the proposed pier design would allow for a 25-year life span before the first major maintenance activities would be required.

Alternative D was not chosen as the NPS preferred alternative because it did not meet the overall purpose of the project as well as Alternative B. The reconstruction of the pier, as proposed under this alternative, would improve public safety. However, the new pier would be sited outside the footprint of the existing pier and would require a new cut into the rock abutment to accommodate the new pier alignment. This would disturb previously undisturbed areas resulting in greater natural resource impacts and would alter the spatial relationship of the new pier to the landscape resulting in a greater impact on the cultural landscape of the Santa Rosa Island Ranching District.

ALTERNATIVES CONSIDERED BUT ELIMINATED FROM FURTHER STUDY

Three other alternative concepts were considered initially, but were not carried forward for environmental analysis in the EA - these are briefly described below, and the rationale for dismissal is disclosed.

Replace Pier to Resemble Historic Character

This alternative would entail replacing the pier with a structure resembling the original 1870s pier. This was eliminated from full consideration because it would not fully meet the expressed purpose and need for federal action. The purpose for the project was to replace or rehabilitate the pier in a manner that provides safe and dry access to the island for park visitors and staff, that is compatible with the character of the historic ranching district, that protects the area's natural resources, and that best serves park operations. A new pier designed to resemble the original 1870s pier would be unsuitable for the park's current operational needs and would not meet the current NPS safety standards for park staff and visitors.

Remove Pier and Use Landing Craft

Under this course of action the pier would be removed entirely and the park's landing craft would be utilized to transfer cargo and carry park staff to and from the island. Visitors to the island would either fly in via aircraft or be transferred to the island via skiff from one of the concessionaire's boats. This was eliminated from full consideration due to inherent dangers associated with "wet" landings. Disembarking a landing craft or small skiff into the shallow waters of Bechers Bay could lead to injuries or even drowning during rough seas. In addition, while the park does use its landing craft to transport cargo to and from the island, it is only efficient when transferring equipment that can be driven off the back of the boat and onto the beach (i.e., vehicles or earth moving machinery). Transporting smaller items (i.e., food, totes of gasoline, garbage, personal supplies) is inefficient because everything has to be transferred in smaller bundles by hand, rather than using park vehicles and the crane to transfer such items in larger bundles.

Replace Pier and Access the Island by Air

Another alternative concept given early consideration involved transporting cargo and visitors to the island via aircraft. Although the island has a dirt airstrip, the expense of transferring fuels, garbage dumpsters, supplies, and personal gear from the mainland would be prohibitive. The estimated cost of deployment by cargo aircraft would exceed \$5,000 per week in addition to actual costs for flight time. In addition to cargo flights, passenger-only flights would have to be chartered. The current National Business Center Aviation Management aircraft can carry up to 40,000 pounds of cargo and 46 passengers per trip. The direct cost to the park for this aircraft is \$450 per trip. Costs for an 8-passenger round trip chartered flight from the mainland to Santa Rosa Island range from \$700 to \$1,200.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is defined by the Council on Environmental Quality (CEQ) as the alternative that best meets the following criteria or objectives, as set out in §101 of NEPA.

- Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- Ensure for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
- Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- Preserve important historic, cultural, and natural aspects of our national heritage and maintaining, wherever possible, an environment that supports diversity and variety of individual choice;

- Achieve a balance between population and resource use that would permit high standards of living and a wide sharing of life's amenities; and
- Enhance the quality of renewable resources and approaching the maximum attainable recycling of depletable resources (NEPA, Section 101).

Simply put, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative that best protects, preserves, and enhances historic, cultural, and natural resources (CEQ, NEPA's 40 Most Asked Questions, 6a). There is no requirement that the environmentally preferable alternative and the agency preferred alternative be the same. However, after completing the environmental analysis, the NPS identified Alternative B – New Pier on Existing Alignment – as the environmentally preferred alternative in the EA because it best meets the definition established by CEQ, as defined above.

By replacing the pier at Bechers Bay as provided in the selected alternative, criterion 1 would be fulfilled by extending the service life of the pier and facilitating overall park operations. Criterion 2 would be fulfilled by replacing the old, degraded pier with a newly designed and engineered pier, which would provide both park staff and visitors many years of safe access to the island. Alternative B would fulfill criterion 3 by protecting visitor and staff health and safety by providing platforms for easy access to and from boats to the pier via a protected staircase; raising the height of the pier out of the highest predicted storm surge; and creating a deck that provides fewer obstacles to people with limited mobility and those NPS staff who load and unload cargo via the truck-mounted crane. In addition, by constructing a new pier within the footprint of the current pier, no new areas above or below water would be disturbed or degraded by either the construction or operation of the pier.

While there are no significant cultural or historic resources associated with the pier, criterion 4 would be partially fulfilled by removing the original A-frame hoist from the pier, and relocating this structure onshore, with interpretive signage explaining its historical significance. Criterion 5 would be fulfilled by providing safe access to Santa Rosa Island for all visitors and staff regardless of physical ability, by maintaining affordable boat access to Santa Rosa Island so all visitors can experience both the natural and cultural resources of the park, and by providing a pier structure that is compatible with the historic district and retaining and interpreting historic features of the existing pier to the visiting public. The selected alternative thus provides greater balance between population and resource use than the other alternatives. Criterion 6 would be met by providing a structurally sound and functional pier that reduces or eliminates the need for frequent temporary repairs that are consumptive of renewable resources such as wooden decking and piles, as well as consuming inordinate amounts of park maintenance labor. Finally, criterion 6 approaches the maximum attainable recycling of depletable resources by retaining drilling spoils from pile installation for use on park roads.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the mitigation measures identified in Table A will be implemented as part of the selected action. The NPS will implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results.

TABLE A: MITIGATION MEASURES TO BE IMPLEMENTED

Resource	Mitigation	Responsible Party
Water Quality	 Best management practices will be implemented by the construction contractor to minimize turbidity plumes and possible contaminants released into the water column during pier construction activities. Additional best management practices will be implemented to ensure safe storage of hazardous materials that may be used during construction (e.g., lubricating fluids, wood treatments, cleaning materials). To prevent runoff, materials removed from the pier will be stockpiled on the island and put blocking before being transported to the mainland for disposal. Measures will also be implemented to prevent construction site debris and materials from being blown into the bay. Best management practices used to control stornwater runoff and minimize erosion will include minimizing disturbance along the existing roadway leading to the pier. A trench drain will be installed on the land side of the pier structure to capture stormwater running down the dirt roadway towards the pier deck. An outer casing 30 to 36-inches in diameter will first be placed into the surficial sediments and the pile holes will be drilled inside the casing. The casing protects water quality by preventing drill cuttings and fine material from entering the water column. The casing will be oscillated if necessary to embed it in the surface material. The casing will not be driven. The hole for the pile will then be drilled into the substrate using an auger drill bit. Cuttings will not be discharged back to the ocean. Solid cuttings will be removed from the drilled hole and stock piled in a previously disturbed site behind the old generator building in the ranch complex for future use by the park. The pile will then be placed at a depth of approximately 15 feet below the surface of the substrate. No pile driving will occur. The casings would be typically left in place for one to two days so that fine suspended material in the water inside the casing has time to settle to the bottom. Once the pile is set, the casing will	Construction Contractor
Air Quality	Wet down materials to prevent dust blowing. Amount of disturbed area will be minimized. The Santa Barbara Air Pollution Control District also recommends that NOx emissions from construction equipment be reduced during construction by adhering to the	

Resource	Mitigation	Responsible Party			
	following measures:	1			
	 Heavy-duty diesel-powered construction equipment manufactured after 1996 (with federally mandated "clean" diesel engines) should be utilized wherever feasible. 				
	The engine size of construction equipment should be the minimum practical size.				
	The number of construction equipment operating simultaneously will be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.				
	 Construction equipment will be maintained in tune per the manufacturer's specifications. 	Construction Contractor			
	Construction equipment operating on site should be equipped with two to four degree engine timing retard or pre-combustion chamber engines.				
	 Catalytic converters should be installed on gasoline- powered equipment, if feasible. 				
,	Diesel catalytic converters should be installed, if available.				
Vegetation	To prevent the transmission of non-native seeds, plants, and animals, all vehicles will be steam cleaned by the construction contractor prior to being transported to Santa Rosa Island. Additionally, no soil will be brought to the island.	Construction Contractor			
	The NPS has consulted with the NMFS and the following measures will be implemented:				
Marine Mammals	 Work will only occur during daylight hours (0700-1900 hours) so that marine mammals are visible at all times during pile installation. 	Construction Contractor			
	 A qualified biological monitor will visually survey the area 1 day prior to the start of drilling operations to establish a baseline. 	Monitoring Contractor			
	A safe zone at a radius of 100 meters from the pile location will be strictly enforced. At 100 meters, sound levels from drilling are expected to be 140 dB (based on a source level of 180 dB re 1 Pa at 1 m). Any marine mammals will still be visible and will not be exposed to levels anywhere near the injury threshold. A marine mammal monitor will survey the area either from work boats or a separate vessel prior to the startup of drilling equipment. Installation will not begin until no marine mammals (pinnipeds or cetaceans) are sighted within a designated "safe zone" for at least 15 minutes prior to	Monitoring Contractor			
	 the initiation of the drilling. Once drilling begins, installation will continue until completed. Before beginning the next pile installation, the monitor will again confirm that the safety zone is clear of marine mammals. 	Monitoring Contractor/Construction Contractor			
	 For drilling activities, the contractor will initiate the drilling at reduced energy for 15 seconds, followed by a 				

Resource	Mitigation	Responsible Party			
	1-minute waiting period. This procedure will be repeated two additional times.	Construction Contractor			
	 Acoustic monitoring will be conducted during drilling activities. 	Monitoring Contractor			
Seabirds	Any artificial lighting used during construction. rehabilitation, or operation of the pier will be kept to a minimum and placed by the construction contractor and the NPS only where needed. All light fixtures will be shielded and flat-bottom lights will be utilized so that illumination is directed downward and does not scatter.	Construction Contractor/Park Staff			
	 Pilings will be installed by the construction contractor by predrilling or augering through rock, then grouting the piles in place. The decking structure will be constructed in-place, floated, or lowered into place. 	Construction Contractor			
Essential Fish Habitat	In-water construction by the construction contractor will be limited to minor assembly work and to the dock footprint:	Construction Contractor			
	Park personnel will survey the area surrounding the pier for the presence of eelgrass and surfgrass. Any eelgrass and surfgrass beds that are found will be marked with buoys to protect them from anchoring impacts associated with the project's demolition and construction activities. Anchoring in these marked beds will be prohibited, and approved anchoring sites will be delineated by marker buoys. A post-construction eelgrass survey will be conducted to assess the extent of disturbance, if any. Any eelgrass beds that may be unavoidably impacted will be mitigated per the terms of NMFS Southern California Eelgrass Mitigation Policy.	Park Staff			
Other Fish	To determine if California grunion are using the beach for spawning, the NPS will conduct surveys prior to pile removal or installation activities to determine if grunion eggs are present in the beach area that could be impacted. If eggs are present, no sand-disturbing activities will occur for the two-week incubation period and until subsequent monitoring indicates that no additional spawning has occurred.	Park Staff			
Santa Rosa Island Fox and Other Terrestrial Animals	Prior to the start of construction related activities each day, the staging area will be thoroughly inspected for Santa Rosa Island foxes.	Park Staff			
	If a Santa Rosa Island fox(es) is observed within the project area, park staff will contact the Contracting Officer to stop construction and operation activities. Park biologists will be contacted to determine the potential effects that could result from the attendant human activity, and the FWS will be contacted to determine if additional consultation is required, as needed. Measures will be employed to best avoid or minimize effects to Santa Rosa Island foxes, including restricting park operations or visitor use until foxes leave on their own accord	Park Staff			
	Best management practices will be used by the contractor during construction related activities to				

Resource	Mitigation	Responsible Party
TK-500TK-E	minimize effects on wildlife. These practices will include prohibiting the arrival of pets to Santa Rosa Island, requiring all garbage to be covered and in appropriate containers, and prohibiting the feeding of wildlife.	Construction Contractor
	 All storage containers used by the contractor during construction will meet specifications outlined by the park; in particular, food will only be transported in plastic containers using tight fitting lids. 	Construction Contractor
	 All landing craft will be required to have rodent control measures in place prior to initiating travel to Santa Rosa Island. 	Construction Contractor/Park Staff
Cultural Landscapes/Historic Structures and Districts	 Replace the pier with a structure that is visually sympathetic to its historic location and compatible in material, construction, and scale with the historic district. Retain and include the original A-frame cattle hoist as part of an interpretive display near the pier. 	Park Staff
Archeological Resources	In the event of unanticipated discovery of previously unknown archeological resources, all work in the immediate vicinity of the discovery will be halted by the construction contractor until resources can be identified and consultation could be completed under the National Historic Preservation Act and its implementing regulations. In the event that any unanticipated Native American burials or funerary objects are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act and its implementing regulations will also be followed.	Construction Contractor/Park Staff
Visitor Use and Experience	The pier will be closed during construction activities; therefore the park will inform the public of this closure through a press release, the park website, and information available to visitors while in the park, among other methods.	Park Staff
Health and Safety	 Staff and visitor training, appropriate signage, and visitor information will be provided by the park to ensure visitor and staff safety when entering and exiting skiffs should they be used to transport visitors to Santa Rosa Island during pier reconstruction or rehabilitation. 	Park Staff

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT

As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse and which on balance may be beneficial, but that may still have significant adverse impacts which require analysis in an Environmental Impact Statement (EIS): As described in the EA, several resources will experience beneficial and adverse impacts during the construction and operation of the new pier; however, no major impacts were identified that would require analysis in an EIS.

Short-term adverse impacts to water quality will be negligible as a result of incorporating the appropriate stormwater controls (a trench drain, gravel-lined swales), which will reduce the total amount of sediment from the road transported through runoff.

Demolition and construction activities proposed under this alternative will likely increase turbidity in the immediate vicinity of the pier as sediments on the ocean floor are disturbed and resuspended in the water column. Given that the bottom sediments are mostly sand, any increase in turbidity caused by the disturbance of the ocean floor will quickly settle. Casing also protects water quality by preventing drill cuttings and fine material from entering the water column. Casings would be typically left in place for one to two days so that the fine suspended material in the water inside the casing has time to settle to the bottom. Cuttings will not be discharged back to the ocean. As a result, impacts to water quality associated with increased turbidity will be negligible, localized, and of short duration.

The use of heavy machinery near and over the water will increase the potential that contaminants such as diesel fuel, oils, lubricants, and hydraulic fluids could be released into the water. To minimize this potential, prior to construction, a hazardous spill prevention plan will be developed by the construction contractors, and approved by the NPS, that outlines the protocols that will be taken in the event of a fuel leak or spill. With the planning efforts and mitigation measures implemented during and after the actions associated with demolition/construction of the proposed pier, adverse impacts to the water quality that could occur from construction equipment in Bechers Bay will be minimized and will likely be negligible and of short duration.

Short-term negligible adverse impacts to water quality within Bechers Bay may occur from use of boats to house work crews during construction. While these boats will be regulated by the U.S. Coast Guard and not be allowed to pump waste into marine waters, the running of the boat, and the use of a skiff to shuttle crew members back and forth may result in negligible amounts of oil and gasoline being released.

Degree of effect on public health or safety: Implementing the selected alternative will result in long-term minor beneficial impacts to health and safety because the existing pier deficiencies will be corrected. This action will improve park staff and visitor safety and decrease the potential for accidents. Short-term minor adverse impacts will occur during the construction of the pier as park visitors are required to access the island via skiffs and park staff will be required to use its landing craft for day-to-day operations.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, wetlands, prime farmlands, wild and scenic rivers, or ecologically critical areas: Although abutting the Santa Rosa Island Ranching Historic District, the existing pier was determined to be a non-contributing resource within the National Register-eligible historic district because it lacks historic integrity. The pier will be replaced on the same alignment. The alignment and orientation of the pier will not change, however the appearance of the pier will be modified and the feeling and association of the pier will change resulting in a minor adverse impact to cultural landscapes. The NPS will document the existing pier and will replace the pier in its existing historic location and construct a new pier that is compatible with the design and materials of the historic pier, i.e., by using round wrapped pilings, and wood deck and railings where possible. The NPS will retain and interpret historic items from the pier (e.g., the A-frame and cattle chute). After applying the Advisory Council on Historic Preservation's criteria of effect, the NPS finds that there will be no adverse effect to historic properties. The California State Historic Preservation Office (SHPO) concurred with this finding on October 3, 2007.

To meet requirements of the Coastal Zone Management Act and the California Coastal Management Program, the selected actions were also evaluated to determine if the project would have any impact on the California coastal zone. It was concluded that the activity would not cause an effect.

There are no other unique characteristics in the area, such as wetlands, prime farmlands, wild and scenic rivers, or ecologically critical areas.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts: Implementing the selected alternative will have no significant, cumulative impacts. The EA addressed cumulative impacts for each of the impact topics potentially affected (marine water resources/water quality; essential fish habitat; Santa Rosa Island Fox; cultural landscapes/historic structures and districts; visitor use and experience; health and safety; and park operations and management). Actions considered in conjunction with the selected actions for their cumulative effects include the past series of pier repairs and past activities to stabilize structures and foreseeable future actions to rehabilitate or\and adaptively re-use structures within the Santa Rosa Island Ranching District.

Due to the localized nature of the impacts foreseen, and by implementing mitigations as specified for the selected alternative in combination with the above actions, the consequences will likely be short-term minor adverse cumulative impacts to marine water resources and water quality in Bechers Bay. No cumulative impacts to the essential fish habitat will result from past pile replacements combined with the pier replacement as detailed above. Actions associated with the selected alternative, in conjunction with the cumulative effects of human activities could result in adverse impacts to the federally endangered Santa Rosa Island fox. During these activities, however, the NPS will employ mitigation measures to ensure protection of island foxes. The minor adverse impacts cultural landscapes anticipated from the implementation of the selected alternative will add a minor adverse incremental impact to the beneficial impacts from past and foreseeable future rehabilitation or\and adaptive re-use of structures within the historic ranching district, which will reduce overall beneficial cumulative effects on cultural landscapes.

Although past pier repair activities have restricted visitor access intermittently, the selected alternative will reduce the need for future pier repair and maintenance activities which will minimize interruptions to concessionaire services and visitor use, resulting in long-term moderate beneficial cumulative effects. A short-term increase in pier use by park staff and construction contractors during rehabilitation of historic ranch structures and a long-term increase in visitor use related to upgraded facilities could result in the increased potential for accidents. This would result in long-term negligible adverse impacts to park staff and visitor safety. These impacts, in combination with the long-term minor to moderate beneficial impacts associated with the selected actions, will result in long-term minor beneficial cumulative impacts to park staff and visitor safety.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources: As explained in the EA, past activities to stabilize structures within the historic ranching district and foreseeable future actions to rehabilitate and/or adaptively re-use structures in the Santa Rosa Island Ranching District have resulted in long-term minor to moderate beneficial impacts on cultural landscapes, historic structures, and districts. The minor adverse impacts to cultural landscapes anticipated from the implementation of the selected alternative will add a minor adverse incremental impact which will reduce the overall beneficial cumulative impacts on cultural landscapes. There will be no impairment of or unacceptable impacts to cultural resources.

Section 106 Summary: After applying the Advisory Council on Historic Preservation's criteria of effect, the NPS finds that implementation of the selected alternative will not diminish the integrity of the cultural landscape or historic district such that its eligibility for listing in the National Register of Historic Places will be jeopardized. Therefore there will be a *no adverse effect* finding.

Coordination with state and federal agencies was conducted during the NEPA process to identify issues and/or concerns related to natural and cultural resources located in and around the site. In accordance with Section 106 of the National Historic Preservation Act of 1966, the park sent a letter to the State Historic

Preservation Officer (SHPO) at the California Office of Historic Preservation on May 26, 2006. The letter initiated the consultation process and briefly explained the project. The EA was forwarded to the SHPO as part of the consultation process. The EA included an Assessment of Effect under Section 106 of the National Historic Preservation Act in the "Environmental Consequences" chapter under "Cultural Landscapes / Historic Structures and Districts." The SHPO concurred with the NPS finding of no adverse effect to historic properties on October 3, 2007.

Subsequently in late 2007, the park cultural resources staff received information from the retired park archeologist about shipwreck remains directly beneath the existing pier (and on the beach approximately 100 feet south of the pier). Archeological investigations were undertaken in early January, 2008 to document the remains and determine their age, integrity and possible identity. Follow up discussions with SHPO staff (Susan Stratton) indicated that further consultation under Section 106 of the National Historic Preservation Act will likely result in a determination of "no adverse effect" on historic properties by the undertaking. Formal consultation will be initiated upon completion of archeological investigations and will be completed prior to commencing the contracting process; delays in project scheduling are not expected to occur. In addition, this discovery has not altered any of the determinations of magnitude of environmental effects, including no significant effects on cultural resources.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat: Actions associated with the future rehabilitation and/or conversion of some of the ranch buildings could result in adverse impacts to the Santa Rosa Island fox from potential conflicts resulting from attendant human activities. During these activities, however, the NPS will employ mitigation measures to ensure the protection of its natural and biological resources, as well as mitigation that specifically addresses the island fox.

The EA was forwarded to both the United States Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for their comments. The USFWS concurs with the determination that the replacement of the pier is not likely to adversely affect the Santa Rosa Island Fox, based on the following: 1) the park would implement and enforce the avoidance and minimization measures; 2) construction activities would occur in previously disturbed areas; and 3) the potential for disturbance to listed species is of a limited time and duration. The NMFS concurred with the determination that the replacement of the pier may affect but is not likely to adversely affect any federally listed marine mammals.

Degree to which effects on quality of the human environment may be highly controversial; Degree to which possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks; Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration; and Whether the action violates federal, state, or local environmental protection law: No highly controversial effects were identified during either preparation of the EA or in the public comment period. No highly uncertain, unique or unknown risks were identified during scoping or preparation of the EA or as a result of the public comment period. The selected alternative neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration. Implementing the selected alternative violates no federal, state, or local environmental protection laws. The replacement will be consistent with all existing local, state, and federal regulations.

IMPAIRMENT OF PARK RESOURCES OR VALUES

The National Park Service Organic Act of 1916 and related laws mandate that the units of the national park system must be managed in a way that leaves them "unimpaired for the enjoyment of future generations." These laws give the NPS the management discretion to allow certain impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impact does not constitute impairment of the affected resources and values. Director's Order 12 states that environmental documents will evaluate and describe impacts that may constitute an impairment of park resources or values. In addition, the decision document will summarize impacts and whether or not such

impacts may constitute an impairment of park resources or values. An impact will be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- 1. necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park,
- 2. key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- 3. identified as a specific goal in the park's general management plan or other relevant NPS planning documents.

The NPS has determined that implementation of the selected alternative will not constitute an impairment to Channel Islands National Park's resources or values. This conclusion is based on a thorough analysis of the environmental impacts as documented in the EA, relevant scientific studies, and the professional judgment of the decision-maker guided by the direction in NPS *Management Policies* (2006). The analysis did not identify any major adverse impacts that will likely result from implementing the selected alternative. All adverse impacts identified were negligible to minor in intensity. Therefore, implementing the selected alternative will not result in impairment of any park resource or value.

PUBLIC INVOLVEMENT AND AGENCY COORDINATION

In April 2006, an internal scoping meeting was held at the park as part of a Value Analysis and Choosing-By-Advantages (CBA) workshop that addressed the replacement and rehabilitation of the pier on Santa Rosa Island. The interdisciplinary CBA team included NPS staff from Channel Islands NP, the Pacific West Regional Office and Denver Service Center, and the URS Corporation. The primary purpose of the workshop was to identify and evaluate potential alternatives.

At the April 2006 meeting the CBA team examined current conditions of the pier and developed different options the park could consider for addressing current problems facing the pier. From those options, a preferred alternative was developed that best met the park's needs. The primary concern of park staff was to repair or replace the pier with structural elements that are sensitive to the Santa Rosa Island Ranching Historic District, while enhancing visitor experience, providing safe and efficient accommodation of park visitors, and serving essential management access needs. Although the pier is not a contributing feature, it is within the historic ranching district.

The park also conducted public scoping during October 2006. Scoping letters were sent on October 3, 2006, to approximately 76 parties, including state and federal agencies, private organizations, individuals, and local libraries, with responses requested within 15 days of receipt. Response letters, including two letters from public agencies (California Department of Game and Fish and California Coastal Commission), outlined concerns related to visitor loading and unloading on the Santa Rosa Island pier and identified mitigation and permits that may be required to protect state-listed species, air quality, and other coastal resources and to construct structures or work in navigable waters of the U.S.

All information received during scoping was incorporated in the Rehabilitation or Replacement of Pier at Bechers Bay EA. The document was made available for public review and comment on August 31, 2007. Availability of the EA for a 30-day public comment period was advertised via press release, and also announced on both the park's website and through the NPS's Planning, Environment, and Public Comment website. The public review and comment period concluded on September 30, 2007.

The NPS provided copies of the EA to approximately 90 agencies, organizations, and interested parties for review and comment. The document was also distributed to 22 local libraries to enhance the public's opportunity to review. Despite the 30-day opportunity for public review, there were no individual or organization comments. The NPS received responses from the Santa Ynez Band of Chumash Indians and the following federal, state, and local agencies: United States Fish and Wildlife Service; the National Oceanic and Atmospheric Administration; State Clearinghouse and Planning Unit of the Governor's Office of Planning and Research; California Department of Parks and Recreation Office of Historic

Preservation; California State Lands Commission; and Santa Barbara County Air Pollution Control District. Comments were also received from the Channel Islands National Marine Sanctuary via a telephone conversation with NPS staff. The Sanctuary indicated that it was not adequately recognized in the EA. Additional information regarding the Sanctuary is included in the Errata. The Sanctuary also provided information on the authorization process for obtaining a permit for the project. The NPS prepared additional information for the NMFS. Based on this information and further consultation with NMFS, measures to protect marine mammals were further defined (see Table A). An incidental take is unlikely to occur.

The State Clearinghouse and Planning Unit of the Governor's Office of Planning and Research acknowledged that the Park has complied with the State Clearinghouse review requirements for draft environmental documents. The Office of Historic Preservation concurred with the determination by the NPS that the proposed undertaking will not have an adverse effect on the historic district. The Department also found that the area of potential effects (APE), the footprint of the pier, is satisfactory pursuant to 36 CFR 800.4(1). The California State Lands Commission (CSLC) commented that the current lease of the existing pier specifically authorizes the pier's continued use and maintenance. Adoption of the selected alternative may require CSLC action to authorize the selected alternative and amend the existing lease and the NPS is pursuing an amendment. The Santa Barbara County Air Pollution Control District (SBCAPCD) agrees with the conclusion in the EA that total emissions from the proposed project will be less than significant with the implementation of the mitigation measures. Both the SBCAPCD and the Army Corps of Engineers (ACOE) provided information on possible permits that may be needed for the project. The NPS will obtain required permits prior to construction. The NPS has requested concurrence with a negative determination from the California Coastal Commission and will complete compliance with the Coastal Zone Management Act prior to construction.

The USFWS concurs with the determination that the replacement of the pier is not likely to adversely affect the Santa Rosa Island Fox, based on the following: 1) the park would implement and enforce the avoidance and minimization measures; 2) construction activities would occur in previously disturbed areas; and 3) the potential for disturbance to listed species is of a limited time and duration. The NMFS concurred with the determination that the replacement of the pier may affect but is not likely to adversely affect any federally listed marine mammals. The NMFS believes that the proposed project would adversely affect essential fish habitat (EFH) for various federally managed fish species within the Coastal Pelagic Species and Pacific Coast Groundfish Fishery Management Plans. However, the proposed mitigation measures identified in the EA adequately avoid, minimize, mitigate, or otherwise offset the adverse effects to EFH. Therefore, the NMFS has no additional EFH conservation recommendations to provide.

The Santa Ynez Band of Chumash Indians requested a response from the park concerning three questions that arose following their review of the proposed project: (1) location of construction staging, (2) cultural resource survey of the APE, (3) information regarding cultural resource survey in this was not already done. The park responded with answers in a letter to the Santa Ynez Band of Chumash Indians dated October 11, 2007.

CONCLUSION

The NPS has selected Alternative B for implementation as described above. The foreseeable impacts that will result from the selected alternative (Alternative B) will not impair any park resource or values necessary to fulfill specific purposes identified in the national park's enabling legislation.

Based on the analysis as documented in the EA, with due consideration for the minimal public scoping and EA response, and given the capability of the mitigation strategies to avoid or minimize impacts, the NPS has determined that the selected alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are negligible to minor in intensity. There are no significant impacts on public health, public safety.

threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the selected alternative will not violate any federal, state, or local environmental protection law.

Recommended:

Russell Galipeau

Superintendent

Channel Islands National Park

Date

Approved:

Jonathan B. Jarvis Regional Director

Pacific West Region

Date

ERRATA SHEETS

Rehabilitation or Replacement of Pier at Bechers Bay

Santa Rosa Island

Channel Islands National Park

Replies were received from seven federal, state, and local agencies and the Santa Ynez Band of Chumash Indians in response to the public review Environmental Assessment (EA). The comments were reviewed to determine whether any new issues, reasonable alternatives, potential for significant impacts, or mitigation measures were suggested. The comments received did not identify new issues or alternatives, nor did they correct or add substantially to the facts presented or increase the level of impact described in the EA. Based on comments from the USFWS, some of the mitigation measures identified to protect Santa Rosa Island foxes were revised. Comments were also received from the Channel Islands National Marine Sanctuary via telephone conversations with NPS staff and additional information on the Sanctuary was added. These revisions amend the environmental assessment.

Changes to the environmental assessment are outlined below. Together, the errata sheets and the environmental assessment form the complete EA. The EA will not be reprinted.

Page 8, Other Federal Agency Plans, Policies, and Actions, Insert:

National Marine Research and Sanctuaries Act

The Channel Islands National Marine Sanctuary (CINMS) is part of a national program that includes 13 marine sanctuaries around the country. The National Marine Sanctuary Program is administered by the National Oceanic and Atmospheric Administration (NOAA) within the Department of Commerce. Congress passed the National Marine Research and Sanctuaries Act in 1972 in response to a growing awareness of the intrinsic natural, cultural and historical value of our oceanic and coastal waters. National Marine Sanctuaries are special places around the country for scuba diving, sport fishing and wildlife viewing. Sanctuary waters provide a safe haven for species close to extinction and protect historically significant shipwrecks and cultural artifacts. They also support valuable commercial industries such as fishing, boating and tourism. National Marine Sanctuaries promote comprehensive management of special ecological, historical, and recreational marine resources. Part of the challenge in managing these special areas is balancing multiple uses. A comprehensive ecosystem management approach is used promote long term conservation of Sanctuary waters.

Channel Islands National Marine Sanctuary

The Channel Islands National Marine Sanctuary (CINMS) was designated on September 22, 1980 in part to protect "significant cultural, natural resources." Administered by NOAA the 1,252.5-square-nautical-mile Sanctuary encompasses the waters surrounding the northern Channel Islands and Santa Barbara Island from high tide to 6 nautical miles offshore. The CINMS completely surrounds the Channel Islands National Park. The Sanctuary includes the entire 3 miles of California state waters plus an equal distance of Federal waters. More than 27 species of cetaceans (whales and dolphins) use the Sanctuary during at least part of the year. There are also five species of pinnipeds (seals and sea lions) that occur in the area. More than 60 species of birds feed in the Sanctuary and more than 23 species of sharks occur here.

The Sanctuary is an area of multiple use, and harvesting of kelp, fish, and invertebrates is permitted in most areas within the CINMS. Within the boundaries of the Sanctuary there are several regulatory agencies (federal, state, and local) that have overlapping jurisdictions and

management responsibilities. The National Marine Sanctuary Program emphasizes the protection of special marine areas for the long-term benefit and enjoyment of the public. Sanctuary management includes research and educational programs as well as resource protection to improve our understanding of the site's resources and promote their wise use. To provide comprehensive protection for this specially protected marine area NOAA has developed cooperative agreements, interagency agreements, and memorandums of understanding with several regulatory agencies.

The Sanctuary prepared a Draft Management Plan (DMP) and accompanying Draft Environmental Impact Statement (DEIS) that was released for public review in May 2006. The DEIS included a range of alternatives consisting of the proposed action, alternative 1, and the no action alternative. After receiving comments on the DEIS, NOAA determined that the original range of alternatives needs to be expanded in order to allow contemplation of additional regulation changes to enhance protection from the potential impacts of sewage and graywater discharges from large vessels. NOAA is developing a Supplemental Draft Environmental Impact Statement (SDEIS) that will discuss the potential environmental consequences of a revised discharge regulation. The proposed revisions to the discharge regulation will be incorporated into the original proposed action, to constitute NOAA's "revised proposed action." At the SDEIS stage, NOAA will not be taking final action on changes to Sanctuary regulations, but rather is analyzing and putting forth for public review and comment a revision to its discharge regulation proposed in the DEIS and the proposed rule (71 FR 29096). Final CINMS regulations will be issued after NOAA has released the Final Management Plan/Final EIS. The Sanctuary anticipates releasing the SDEIS for public review and comment in 2007.

Based on comments received during the public comment period for the DMP/DEIS, and the forthcoming public comment period for the SDEIS, the Sanctuary will prepare a Final Management Plan and Final Environmental Impact Statement. The final documents will include responses to all comments received during the public comment periods. The Sanctuary anticipates publishing the final documents in late 2007.

It is not expected that the proposed NPS project would be in conflict with management of the Sanctuary. Impacts to submerged lands of the Sanctuary could be allowed pursuant to a permit issued from the Sanctuary.

Page 18, Alternative B – New Pier on Existing Alignment (NPS Preferred), first paragraph, replace last three sentences with:

An outer casing 30 to 36-inches in diameter would first be placed into the surficial sediments and the pile holes would be drilled inside the casing. The casing protects water quality by preventing drill cuttings and fine material from entering the water column. The casing would be oscillated if necessary to embed it in the surface material. The casing would not be driven. The hole for the pile would then be drilled into the substrate using an auger drill bit. Auger drill bits use hardened carbide steel teeth to advance the hole using a cutting or scraping action, as opposed to hard rock drill tips which progress by grinding rock into a powder. Cuttings would not be discharged back to the ocean. Solid cuttings would be removed from the drilled hole and stock piled in a previously disturbed site within ½ mile from the pier to be used by the park, the location to be determined by the Contracting Officer. The pile would then be placed in the drilled hole and grouted with Portland cement grout pumped into the bottom of the hole. Piles would be placed at a depth of approximately 15 feet below the surface of the substrate. No pile driving would occur. The casings would be typically left in place for one to two days so that fine suspended material in the water inside the casing has time to settle to the bottom. Once the pile is set, the casing would be removed by lifting it out of the surface material.

Page 24, Santa Rosa Island Fox and Other Terrestrial Wildlife, first and second paragraphs, replace with:

Prior to the start of construction related activities each day, the staging area will be thoroughly inspected for Santa Rosa Island foxes.

If a Santa Rosa Island fox(es) is observed within the project area, Park staff will contact the Contracting Officer to stop construction and operation activities. Park biologists will be contacted to determine the potential effects that could result from the attendant human activity, and the USFWS will be contacted to determine if additional consultation is required, as needed. Measures will be employed to best avoid or minimize effects to Santa Rosa Island foxes, including restricting Park operations or visitor use until foxes leave on their own accord.

Page 59, Impacts of Alternative B – New Pier on Existing Alignment, third paragraph, line 4, starting "To minimize this potential...", replace with:

Prior to the start of construction related activities each day, the staging area will be thoroughly inspected for Santa Rosa Island foxes.

If a Santa Rosa Island fox(es) is observed within the project area, Park staff will contact the Contracting Officer to stop construction and operation activities. Park biologists will be contacted to determine the potential effects that could result from the attendant human activity, and the USFWS will be contacted to determine if additional consultation is required, as needed. Measures will be employed to best avoid or minimize effects to Santa Rosa Island foxes, including restricting Park operations or visitor use until foxes leave on their own accord.

Page 59, Impacts of Alternative B – New Pier on Existing Alignment, fourth paragraph, next to last sentence, delete "or relocating individuals to more remote areas of the island."

For the preferred alternative, delete references to "driving piles" and "pile driving."

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