

Chapter 1: Purpose and Need for Action

1.1 INTRODUCTION

The San Juan Island National Historical Park (park) of the National Park Service (NPS) and Western Federal Lands Highway Division (WFLHD) of the Federal Highway Administration (FHWA) propose to realign a portion of Cattle Point Road (road) on San Juan Island. Approximately 500 feet of road located near milepost (MP) 8.3 is currently threatened by coastal erosion. Alternatives to safely move the road away from the threatened area would require the construction of approximately 2,800 feet to 4,900 feet of new road.

The proposed project is located in San Juan County, Washington. The NPS is involved in the project because the majority of the proposed road realignment is within the park, which is managed by the NPS. The FHWA is involved because National Environmental Policy Act (NEPA) documentation and preliminary project investigation is being funded through the Public Lands Highway Program of the Highway Trust Fund. The FHWA has stewardship and oversight responsibilities for funds disbursed from the Highway Trust Fund. In addition, the FHWA has expertise in developing transportation projects on federal lands and the NPS requested FHWA assistance. To date, no funds have been appropriated for road construction. If a construction alternative is selected, agencies will seek funding for road construction following the NEPA decision.

Cattle Point Road provides the only road access to the Cattle Point area, which includes lands within the park as well as other public and private property on the southeast tip of San Juan Island. The Cattle Point Natural Resources Conservation Area (NRCA), managed by the Washington State Department of Natural Resources (DNR), is located on the eastern boundary of the park. The road allows pedestrians, bicyclists, and visitors traveling by vehicle to enjoy the features of the area. It also accesses private property at the southeast tip of the island, which is home to approximately 270 residents. The road through the project area is owned and maintained by San Juan County.



Figure 1.1 - View of Cattle Point Road and project area looking east. Problem area is located at the top of the bluff near the end of the point.

Coastal wind and wave action is eroding the base of the bluff that supports the road near MP 8.3 (figure 1.1). At the current rate of erosion, it is estimated that the eroding bluff scarp would reach a point 2 feet horizontal-distance from the outside face of the guardrail post in about 14 years from present (i.e. 2026). It is expected that bluff erosion would continue progressively, eventually causing roadway damage and closure. As bluff erosion progresses into the roadway, traffic may be restricted to one lane for a period before complete road closure is required. Failure of the road would cut off vehicular access to the east end of the Cattle Point peninsula, restricting access to the area to only hiking trails, helicopter, seaplane, or boat.

This Final Environmental Impact Statement (FEIS) documents the analysis of potential environmental consequences of maintaining road access to the Cattle Point area considering the threat of coastal erosion to the existing road. The FEIS evaluates the no action alternative (alternative A) and three action alternatives (alternatives B, C, and D) to reconstruct the road.

The analysis in this document complies with the provisions of NEPA, which requires that federally-funded programs consider the environmental impacts (including social and cultural) of their proposed actions. Based on a preliminary review of the proposed project, the FHWA and NPS have determined that an Environmental Impact Statement (EIS) should be prepared. This EIS complies with the NEPA implementing procedures for the FHWA (Environmental Impact and Related Procedures, 23 Code of Federal Regulations [CFR] 771) and the NPS (Environmental Impact Analysis and Decision Making, Director's Order 12 NPS 2001a). Per the CEQ regulations for implementing NEPA, the intent of this report is to present and describe the environment of the area(s) to be affected or created by the alternatives under consideration (40 CFR 1502.15).

Four agencies comprise the project team. The FHWA and NPS are the lead agencies for the proposed project, and San Juan County (county) and the DNR are cooperating agencies. The

lead agencies have the responsibility for developing the project, including NEPA compliance and selecting an alternative, while the cooperating agencies are involved as partners in developing the project and providing input. In addition to meeting the statutory and regulatory needs of the NPS and FHWA, this document also addresses county and DNR issues and needs as identified through their involvement as cooperating agencies.

1.2 THE PROPOSED PROJECT

Through project “scoping,” or gathering of information prior to drafting an environmental document, the project team identified the specific problem, addressed why the problem was important, and identified related issues and concerns to be considered in the analysis. Through this effort, the team identified the importance of the access provided to Cattle Point and determined why and how the project would be proposed.

1.2.1 Purpose

The purpose of this project is to maintain vehicular, bicycle, and pedestrian road access to the Cattle Point area through the San Juan Island National Historical Park. Maintaining this access includes continuing to provide a safe and pleasant roadway experience for residents and visitors without the threat of road failure from coastal erosion.

1.2.2 Need

The proposed project is needed because the only road access to the Cattle Point area of San Juan Island is threatened by coastal bluff erosion. At the current rate of erosion, it is estimated that the bluff scarp would reach a point 2 feet horizontal-distance from the outside face of the guardrail post in about 14 years from present (i.e. 2026). It is expected that bluff erosion would continue progressively, eventually causing roadway damage and closure. Failure of the Cattle Point Road would result in loss of road access to the east end of the Cattle Point peninsula.

Cattle Point Road is the primary link between the privately-owned residences in the Cattle Point and Cape San Juan residential areas and the town of Friday Harbor (the main town on the island), as well as to the rest of San Juan Island. San Juan Island is a popular retreat for vacationers, retirees, and those seeking a relaxed lifestyle.

Cattle Point Road is managed by San Juan County and the National Park Service (NPS), depending on land ownership. The portion of the road north of the park boundary is owned and maintained by the county. From the park entrance eastward, the road is maintained by the county on lands owned by the park and DNR. The county retains a right-of-way (ROW) on park land from Pickett's Lane east to the DNR boundary. Within the park, county maintenance is performed through an informal agreement between the county and NPS.

1.3 LOCATION

The proposed project is located on a part of Cattle Point Road at the southern tip of San Juan Island in San Juan County, Washington (figure 1.2). Cattle Point Road begins at the intersection with Mullis Street and Argyle Avenue just south of the town of Friday Harbor and extends southeast through rural county and private land to the park entrance. The road then passes through the park for 3.5 miles to the project area. From here, the road leaves the park and passes through a small portion of the Cattle Point NRCA before ending in the

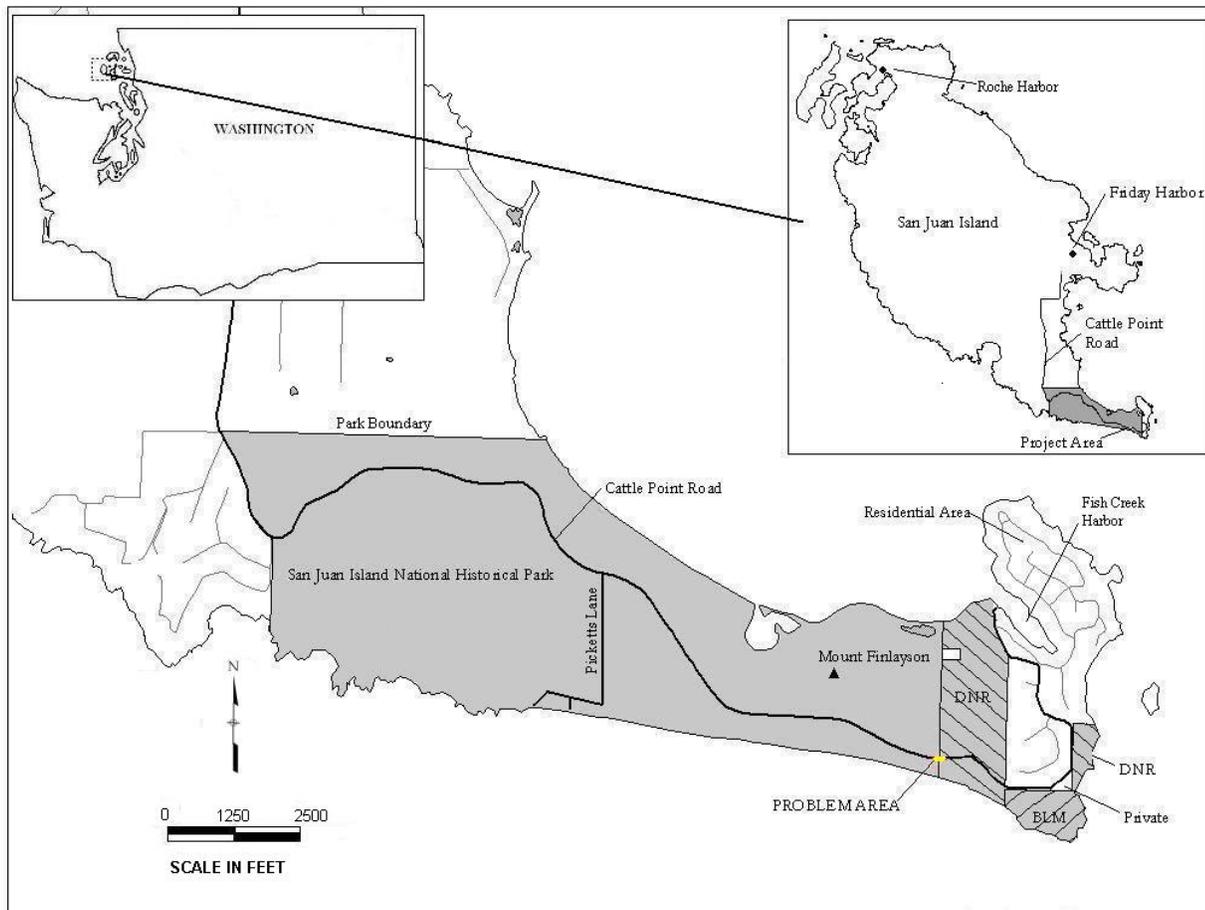


Figure 1.2 - Cattle Point Road project location

Cape San Juan residential area. The entire road, from the intersection with Mullis Street/Argyle Avenue to Cape San Juan, is 9.5 miles long.

The 500-foot section of road threatened by bluff erosion is located within the park and extends along a curve in an east-west direction near milepost (MP) 8.3. This section of road is located on the south slope of the Mt. Finlayson ridgeline.

The project area includes the immediate vicinity of the proposed alternatives and the areas that could be directly impacted by construction (figure 1.3). The NRCA is located directly east of the threatened road section and would be affected by all of the action alternatives. The Cattle Point and Cape San Juan residential areas are located east and north of the NRCA. No homes would be directly impacted by construction of proposed alternatives.



Figure 1.3 - Project area and land ownership

Cattle Point is dominated by the ridgeline of Mt. Finlayson. The south side of the ridge contains open grassland, while the north side is primarily mature coniferous forest. The Cattle Point area includes a variety of natural habitats. These include undeveloped rocky shorelines with scenic vistas; rich marine habitat supporting a broad diversity of aquatic plants and animals; grasslands; dunes; old-growth remnants and mature forests of Douglas fir, western red cedar, Sitka spruce, and western hemlock; freshwater wetlands; steep coastal bluffs; and intertidal lagoons. Wildlife is abundant in the area and includes a diverse variety of marine and terrestrial species. In addition to being an important and unique natural area, Cattle Point offers outstanding views of the Olympic and Cascade Mountains and the surrounding islands.

The Cattle Point area contains land owned by the NPS, Bureau of Land Management (BLM), DNR, and private individuals. The American Camp unit of the San Juan Island National Historical Park encompasses most of the Cattle Point peninsula. At 1,223 acres, it includes the historical area, lagoons, Mt. Finlayson, and shoreline.

The park is bordered on the east by the Cattle Point Natural Resource Conservation Area (NRCA), which is managed by the DNR. The 112-acre NRCA consists of two waterfront parcels. The larger parcel is located in the project area. It includes waterfront on the Strait of Juan de Fuca and extends across the Mt. Finlayson ridge to Griffin Bay. The smaller parcel is on the east end of Cattle Point and includes a day use recreation area and interpretive site.

The NRCA contains many of the unique features of Cattle Point, including the undeveloped rocky shorelines, grassland, mature forests, steep coastal bluffs, and a rare high-salinity salt marsh. It provides protection for a variety of state-priority habitats and species, geologic features, and outstanding scenic vistas. Primitive outdoor recreation opportunities such as hiking trails and viewpoints exist throughout the site.

The BLM property is a 27-acre parcel located at the south end of Cattle Point. The property contains a small network of trails, interpretive panels, and a kiosk as well as a working lighthouse owned and operated by the U.S. Coast Guard. A pullout on Cattle Point Road, about 0.5 miles east of the project area, is the head of a popular trail leading to the lighthouse.

The eastern end of Cattle Point consists of the Cattle Point Estates and Cape San Juan residential areas. The housing developments include approximately 150 lots, some of which have not been developed. Currently, these developments are home to approximately 270 permanent and seasonal residents.

Table 1.1 - Cattle Point area land ownership

Owner or Jurisdiction	Acres
National Park Service (San Juan Island NHP-American Camp Unit)	1,223
Washington State DNR (Cattle Pt NRCA)	112
Bureau of Land Management	27
County and Private Lands	220 (est.)

1.4 THE PROJECT TEAM

An interdisciplinary project team (team) was formed to identify the purpose and need for the project, develop possible solutions (alternatives), identify the resources in the area that might be impacted by the project (affected environment), and thoroughly evaluate potential project impacts (environmental consequences).

The FHWA and NPS are co-lead agencies for this project.

The NPS is involved because the road is located within the park boundary, and the NPS is the land managing agency for the park. Cattle Point Road is the major route used by visitors to access the park.

The FHWA is involved because project NEPA and preliminary planning is being funded through the Public Lands Highway Program of the Highway Trust Fund. The FHWA has stewardship and oversight responsibilities for funds disbursed from the Highway Trust Fund. In addition, the FHWA has expertise in developing transportation projects on federal lands.

Under an interagency agreement, the FHWA is responsible for a majority of the road design and construction, while the NPS is responsible for planning and protection of the environment and park values. Through the Cattle Point project agreement, the FHWA has been assigned the responsibility for developing the NEPA document and providing design and engineering services. The FHWA and NPS have worked together in project development and resource studies. Should an action alternative be selected, the FHWA will work with the NPS to obtain permits and will solicit and administer the construction contract.

The DNR and San Juan County are involved as cooperating agencies because state and privately-owned land is accessed by the road. The county owns and maintains the threatened section of road and the DNR owns property at the eastern end of the project area.

1.4.1 Agency Mission and Goals

The mission and goals of the lead and cooperating agencies provide direction for managing their resources and determining their interests with respect to the proposed project. These interests influence how alternatives are identified and evaluated in developing this project because they reflect what is important to each agency involved. This section details the primary management responsibilities and goals of the agencies represented on the project team.

San Juan Island National Historical Park

San Juan Island National Historical Park was established in 1966 to interpret and commemorate the historic events that occurred from 1853 to 1874, culminating in the peaceful arbitration of an international boundary dispute between the United States and Great Britain. The park also protects significant natural resources, many of which played a role in the human history of the area. The park possesses significance extending beyond single properties or buildings, as recognized by its designation as a National Historic Landmark.

As a unit of the National Park System, park management is derived from the National Park Service Organic Act (1916) (16 USC 1). The mission of the NPS is to promote and regulate the use of the national parks and to conserve the scenery, the natural and historic objects, and wildlife for the enjoyment of future generations.

The park uses current management practices, systems, and technologies to accomplish the NPS mission and park goals. The *San Juan Island National Historical Park Final General Management Plan and Environmental Impact Statement* (NPS 2008) details how these goals are transferred to managing resources and activities occurring in the park.

Federal Highway Administration

The mission of the Federal Highway Administration (FHWA) is to improve mobility on the nation's highways through national leadership, innovation, and program delivery. The Office of Federal Lands Highway is a part of the FHWA. Federal Lands Highways provides program stewardship and transportation engineering services for planning, design, construction, and rehabilitation of the highways and bridges that provide access to and through federally owned lands. The Western Federal Lands Highway Division (WFLHD) operates as part of the Federal Lands Highway Program, serving the needs of Oregon, Washington, Idaho, Montana, Alaska, and Yellowstone and Grand Teton National Parks in Wyoming.

San Juan County

San Juan County government goals include providing public services necessary for the health, safety, and general well-being of the citizens of San Juan County while striving to preserve the heritage of the islands, both environmentally and culturally (www.sanjuanco.com).

Washington State Department of Natural Resources

The Cattle Point NRCA is managed by the Washington State Department of Natural Resources (DNR). The mission of the DNR is to provide professional stewardship of state lands and natural resources as well as provide leadership in creating a sustainable future for the state-trust lands.

Natural Resources Conservation Areas (NRCA) are managed under the Washington Natural Areas Program. The Natural Areas Program was created by the state legislature in 1987 to protect special areas of statewide significance. NRCAs were established for their outstanding

scenic and ecological values and to provide opportunities for education and low-impact public use where appropriate (www.dnr.wa.gov).

1.4.2 Agency Jurisdiction

The project team is comprised of federal, state, and county agencies whose planning requirements and regulations must all be considered in project development. Project planning is federally funded and led by the FHWA and NPS. Federal projects are exempt from state and local laws such as state threatened and endangered species regulations and local ordinances that do not have a regulatory connection to a federal law. Since the state owns land that would be affected by the proposed project alternatives and since NPS management policies require the agency to consider state-listed rare, threatened, or endangered species, these issues will be considered in this analysis.

State and local agencies must comply with the Washington State Environmental Policy Act (SEPA), Revised Code of Washington (RCW) 43.21C. SEPA requires state and local agencies to consider the likely environmental consequences of a proposal before approving or denying it. SEPA requirements are similar to NEPA and have been considered in the development of this project and FEIS. Following a decision by the lead agencies and completion of the NEPA process, supplementary compliance would be conducted by the county and DNR. The county would have lead responsibility for SEPA compliance.



Figure 1.4 - Roadway approaching the eroding bluff area

1.5 KEY ISSUES AND DECISIONS TO BE MADE

1.5.1 Key Issues

An issue is a concern that could have an effect on a physical, biological, social, or economic resource. A number of issues related to the project were identified during project scoping, public involvement, and agency effort. These issues were used to determine the relevant resources to be analyzed in detail in the FEIS. These resources are described in detail in chapter 3. Effects to these resources from proposed alternatives are described in chapter 4.

Recreational Use – Cattle Point Road provides access for bicyclists, pedestrians, and vehicles to enjoy the natural features of the area. Combined with the trail system, the road allows users to enjoy the features of the park, NRCA, and Cattle Point area, including Mt. Finlayson, the shoreline, the grassland, and the forested north side of the ridge. Public comments reflected the importance of maintaining the trail system and natural resources that people travel to the area to enjoy. These issues are discussed in the Visitor Uses, Trail System, and Transportation sections.

Transportation Needs – Cattle Point Road is a key resource for meeting the transportation needs for both visitors and residents of the Cattle Point area. A number of public comments stressed the importance of the road for transportation to residences on Cattle Point. Providing transportation access is also a priority for the county and FHWA as reflected in their agency mission and goals. These issues are discussed in the Transportation and Socioeconomic sections.

Socioeconomics – Wise use of taxpayer money is of concern to the public and government agencies. Ideas and concerns were expressed by the public and agencies related to the cost of project alternatives and the potential benefits to the economy of the island. These issues are discussed under the Socioeconomics section. Costs of the alternatives are discussed in chapter 2.

Access to Essential Services – The road provides access for Cattle Point residents to essential services such as healthcare and emergency services. Some public comments stressed the importance of this access. These issues are discussed in the Public Health and Safety section.

Visual Quality – The view-sheds from the road, park, trail system, residential area, and other natural areas are important features of the Cattle Point environment. Many NPS, DNR, and public comments stressed the importance of the visual quality of the area. These issues are discussed under the Visual Quality and Cultural Landscape sections.

Historic and Cultural Resources – The important historic and cultural resources of the area were the basis for establishment of the national park. Portions of the project area can be viewed from the historic area of the park. American Indian tribes are concerned about the potential effects of the project on traditional properties. These issues are discussed under the Cultural, Historic, and Archaeological Resources section.

Geologic Features – One of the key features of the Cattle Point area is the natural benches formed by the glacial rebound process. NPS and public comments mentioned the importance of this feature. These issues are discussed under the Topography and Geology sections.

Natural Environment – The natural environment of Cattle Point includes rare prairie grassland, mature coniferous forest, freshwater lagoons, coastal shoreline, and near-shore marine waters.

These habitats support a number of plant and wildlife species. The natural features of the area and preservation of biological diversity are important values of the NRCA and are of great importance to the mission of the park. Several NPS, DNR, and public comments stressed the importance of the natural elements of the area including the bald eagle, island marble butterfly, and native prairie. These issues are discussed in the Vegetation, Wildlife, and Threatened and Endangered Species sections.

1.5.2 Decisions to be Made

The decisions to be made as the result of this analysis are whether to:

- Implement, Alternative A, the no action alternative,
- Implement the preferred Alternative B, or
- Implement another alternative (C or D) evaluated in this document.

If an action alternative (B, C, or D) is selected, additional decisions would be made regarding final road design and funding of construction; refining mitigation measures; and finalizing a revegetation and restoration plan.

1.6 LAWS, REGULATIONS, AND POLICIES

The following laws, regulations, and policies are applicable to the development and analysis of the alternatives in this FEIS.

1.6.1 National Environmental Policy Act

This FEIS has been prepared in accordance with the National Environmental Policy Act (NEPA), enacted in Title 42 of the United States Code, 4321 et. seq. Regulations implementing NEPA are established by the President's Council on Environmental Quality (CEQ) (40 CFR Parts 1500 to 1508). CEQ regulations establish the requirements and processes for agencies to fulfill their obligations under the act.

The National Park Service is part of the Department of Interior, whose regulations for implementing NEPA are found in Part 516 of the Department of Interior Departmental Manual. NPS guidelines for implementing NEPA are further described in the NPS Director's Order 12: *Environmental Impact Analysis and Decision Making*.

Western Federal Lands Highway Division is part of the Federal Highway Administration, whose regulations for implementing NEPA are found in 23 CFR 771, with further guidance in FHWA Technical Advisory T6640.8a.

1.6.2 1970 National Park Service General Authorities Act (amended in 1978 – Redwood amendment)

This act prohibits the National Park Service from allowing any activities that that would detract from the values and purposes for which the parks have been established (except as directly and specifically provided by Congress in the enabling legislation for the parks). The National Park Service has established management policies for all units under its stewardship to clarify its responsibilities under these laws and regulations.

1.6.3 National Park Service Management Policies (2006)

The NPS 2006 Management Policies govern how park managers make decisions on a wide range of issues. It specifies that park roads will be well-constructed, sensitive to natural and cultural resources, reflect the highest principles of park design, and enhance the visitor experience. It also specifies that park roads are generally not intended to provide fast and convenient transportation; rather, they are intended to enhance the quality of a visit while providing for safe and efficient travel, with minimal or no impacts on natural and cultural resources.

Park road designs are subject to NPS Park Road Standards, which are adaptable to each park's unique character and resource limitations. Although some existing roads do not meet current engineering standards, they may be important cultural resources whose values must be preserved.

In addition to determining the potential environmental consequences of implementing proposed project alternatives as required by NEPA, section 1.4 of the 2006 Management Policies requires a determination that implementation of any actions would not 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, is the conservation of park resources and values. Park managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adverse impacts on cultural and natural resources and park values. However, these laws also afford park managers discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the express 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 any 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. Whether an impact has such a result depends on the particular resources that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the actions in question combined with other impacts.

As noted in section 1.4.7 of the 2006 Management Policies, in addition to the above potential environmental consequences, the park manager also takes into consideration consultations required under section 106 of the National Historic Preservation Act (NHPS), relevant scientific information, pertinent information from subject matter experts, and results of related civic engagement and public involvement activities.

The park manager's determination of non-impairment will be provided as an attachment to the NPS Record of Decision (ROD).

1.6.4 National Park Service Directors Order 87A: Park Road Standards (NPS 1984)

This guidance states that the quality of the park experience must be the primary concern in providing roads. Consequently, park roads are designed with extreme care and sensitivity with respect to the terrain and environment through which they pass and are laid lightly onto the land.

1.6.5 Regulatory Compliance Requirements

Selection of an action alternative would require:

- Compliance with Section 4(f) of the Department of Transportation Act of 1966
- DNR and county compliance with the State Environmental Policy Act
- Possible consultation with the U.S. Fish and Wildlife Service under the Bald and Golden Eagle Protection Act and Section 7 of the Endangered Species Act for effects to listed species
- Consultation with the Washington State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act
- National Pollution Discharge Elimination System (NPDES) General Construction Permit from the U.S. Environmental Protection Agency
- Coastal Zone Management Act consistency review from the Washington State Department of Ecology (WDOE)
- Construction and permanent easement/ROWs from the park and DNR for construction and road realignment
- Development of a revegetation plan

None of the alternatives is expected to involve fill into waters of the U.S.; therefore, a Section 404 permit would not be required. The area is designated as a Class II attainment area under the Clean Air Act; however, no special provisions would apply.

If an action alternative is selected, the requirements and mitigation measures in the EIS will be followed during the project refinement and construction process. This document would be revisited if, at any point, new information is discovered that would affect the decisions made or substantially change the effects described.