



**FEMA**

**FINDING OF NO SIGNIFICANT IMPACT**  
**Clark and Sucia Islands Campsites and Trail Relocation**  
**Washington State Parks and Recreation Commission**  
**FEMA -1641-DR-WA PW 73 and 77**

The Washington State Parks and Recreation Commission (WS-P&RC) applied through the Washington State Emergency Management Division (WS-EMD) to the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) for funding assistance to reconstruct eight primitive campsites and connecting foot trails at Clark and Sucia Island State Parks. The State owns both Islands (the entire Island). The Islands are located in the Strait of Georgia in San Juan County, Washington. These campsites were either destroyed or damaged during the January 27 to February 4, 2006 severe storms and tidal surge disaster. The event was declared a Presidential disaster on May 17, 2006 (FEMA-1641-DR-WA). FEMA is proposing to fund 75 percent of the cost for this project through its Public Assistance (PA) program.

In accordance with the National Environmental Policy Act (NEPA) of 1969 and FEMA's implementing regulations, FEMA prepared a Draft Environmental Assessment (EA) to identify and evaluate potential environmental impacts resulting from the alternatives presented in the EA and to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI). Alternatives evaluated in the EA include: (1) The Preferred Alternative: Relocate Clark and Sucia Island Campsites and Trails; (2) Repair Camp Sites at the Existing Locations; and (4) No Action Alternative. The Preferred Alternative was selected because it eliminates the risk from future damages.

The Draft EA was submitted for public review and comment in March, 2007. FEMA received comments from the Samish and Lummi Tribes supporting the project. FEMA received a comment from Washington State Department of Archaeology and Historic Preservation (WS-DAHP) dated March 20, 2007. The WS-DAHP did not concur with the determination presented in the EA; expressed technical and procedural concerns; and requested a revised survey and report be completed and submitted so the WS-DAHP could complete their review. WS-P&RC completed and submitted the report, "Cultural Resources Investigations for the Washington State Parks and Recreation Commission Sucia and Clark Islands Campsite and Trail Relocation Project, San Juan County, Washington" by letter dated January 22, 2008. By letter dated February 1, 2008, WS-DAHP concurred with the findings of "No Historic Properties Affected" for the FEMA funded campsite relocation.

This proposed project as described in the EA was evaluated for any potential significant adverse impacts to climate, geology and soils; water resources (surface water, groundwater, waters of the United States, and floodplains); vegetation; biological resources (vegetation, fish and wildlife, State and Federally-listed threatened or endangered species and critical habitat), and cultural

resources. It was also evaluated for disproportionately high and adverse effects on minority or low income populations.

## FINDINGS

Based upon the attached Mitigation Measures and Final EA, and in accordance with FEMA's regulations in 44 Code of Regulations (CFR) Part 10 for environmental consideration, including Endangered Species Act (No Effect to species or habitat); Section 106 of the National Historic Preservation Act (No Properties Affected); and Executive Orders (EOs) addressing floodplains (EO 11988), wetlands (EO 11990), and environmental justice (EO 12898), FEMA determined the proposed project with the prescribed Mitigation Measures will not significantly affect the quality of the natural and human environment. As a result of this FONSI, an EIS will not be prepared (44 CFR Part 10.8) and the project as described in the attached Final EA may proceed.

## APPROVAL



Mark G. Eberlein  
Regional Environmental Officer  
FEMA Region 10

2-19-08

Date

## Attachment A: FONSI (Clark and Sucia Islands Campsites and Trail Relocation)

### MITIGATION MEASURES

Mitigation Measures refers to actions that would minimize or eliminate potential adverse environmental impacts that could result from the proposed action. Mitigation Measures include:

- The repairs/relocation shall be in compliance with the “San Juan State Park Area Management Plan”.
- WS\_P&RC is required to obtain and comply with all required local, State, and Federal permits and approvals prior to implementation.
- The applicant is responsible for selecting, implementing, monitoring and maintaining Best Management Practices (BMPs) to control erosion and sediment, reduce spills and pollution, and provide habitat protection.
- Brush and small trees (less than 6 inches in diameter) will be removed from the trail/campsites by hand and cut off level with the ground and chipped. The wood chips will be spread over geosynthetic material used to surface the trails and campsites. Geogrid with Geotextile will be installed to 1) reinforce the substrate from rutting and wear; 2) minimize erosion; 3) separate the new trail/campsite activity from historic soil; 4) reduce the need for additional fill; and 5) support drainage across and along the trail and campsites
- New composting toilets will be installed near the new campsites. Toilet installation will depend on user accessibility, maintenance effort, and system capacity. For every pit toilet abandoned, a composting toilet that completely digests the waste will be installed.
- Work will be limited to the period between August 1 and December 15 of any year to protect the nesting bald eagles.
- In the event historically or archaeologically significant materials or sites (or evidence thereof) are discovered during the implementation of the project, the project shall be halted and all reasonable measures taken to avoid or minimize harm to property until such time as FEMA ( in consultation with the State Historic Preservation Officer (SHPO), Lummi and/or Samish Tribal Historic Preservation Officer (THPO), and WS-EMD) determines appropriate measures have been taken to ensure that the project is in compliance with the National Historic Preservation Act.

### RECOMENDATIONS

Recommendations refer to actions not required by FEMA but recommended by the Indian Tribes and the WS-DAHP to protect existing Cultural Resources on the Islands but outside of the project area and Area of Potential Effect. The Tribes and WS-DAHP strongly recommend the WS-P&RC take steps to stabilize and protect exposed banks and surfaces from further impacts (as identified on pages 10 & 11 of their Report). The Tribes & WS-DAHP are committed to discussing preservation techniques and strategies with WS-DAHP.