



Summary of Public Involvement

In the spring of 1999, the National Park Service organized an interdisciplinary planning team to begin a new general management plan for the Reserve. The team included both the Reserve's Trust Board (which included members from the NPS, Washington State, Island County and Town of Coupeville) and staff, and staff from the NPS Pacific West Region-Seattle Office in Seattle, Washington. On May 22, 2000, a Notice of Intent to prepare an environmental impact statement for Ebey's Landing National Historical Reserve was published in the Federal Register (Volume 65, Number 99, pages 32122-321232).

The official public scoping process began in June 2000 when NPS staff produced and mailed a newsletter to approximately 650 people on the Reserve's mailing list. In addition, over 2800 newsletter copies were distributed at local public places such as libraries, civic buildings, businesses, and parks.

The purpose of the newsletter was to encourage participation and comment on critical park issues that would be addressed in a new management plan. The newsletter described issues that the GMP would need to address for the park to carry out its mission of preservation and visitor use. It also mentioned the function of a general management plan and environmental impact statement, and provided a schedule of the planning steps including dates, time, and location for the public meetings.

Public Scoping Meetings

In June 2000, the planning team held a series of public scoping meetings. Included in the agenda was an overview of the Reserve, a review of the GMP planning process, and a discussion of issues or concerns. The first meeting occurred in Seattle, Washington on June 20, 2000 at the REI Building in downtown Seattle. Twenty-four people attended and signed in including a representative from the Washington Native Plant Society.

On June 21, 2000, the planning team held two additional meetings in Coupeville, Washington at the Recreation Hall. Twenty people attended the afternoon session. Representatives from Central Whidbey Trails Council, the Town of Coupeville, and members from Ebey's Landing Trust Board attended. Thirty-three people, primarily property and business owners, neighbors, and farmers

signed in. Organizations represented included Au Sable Institute, the Friends of Ebey's, Whidbey Environmental Action Network, Coastal Defense Study Group, and the *Whidbey News-Times*. In total, 141 verbal comments were recorded from the three meetings.

Individual scoping meetings were held between August 2000 and January 2001 to meet with organizations located within the Reserve to discuss issues of mutual interest. Representatives from the NPS planning team and the Reserve Manager met with the following groups: The Nature Conservancy, Au Sable Institute, Whidbey Audubon, Whidbey Environmental Action Network, Island County Planning Department, U.S. Navy (Outlying Landing Field), Seattle Pacific University (Bocker Environmental Reserve), Coupeville Planning Department, and Washington State Parks (Fort Ebey and Fort Casey state parks). Other meetings with additional organizations were scheduled. Scoping letters and comments were received until August 15, 2000.

Written Comments

The planning team received 36 letters during the official public scoping comment period. Some of these comments were returned to the NPS via the "mail back form" in the scoping newsletter. Other comments were sent as individual letters, some several pages long. Fifteen were from the town of Coupeville, 9 from Whidbey Island, 9 from Western Washington, 1 from Eastern Washington, and 2 from other states (Pennsylvania and Arizona).

Summary of Comments

Both verbal (from the public meetings) and written comments are grouped together under the following headings and are summarized.

Resource Protection

Cultural Resources

- Several commentors mentioned the importance of preserving historic buildings.
- Some suggested setting up an endowment fund for historic preservation or donating time and money and using volunteers.
- Others suggested using façade easements to help preserve historic buildings along with land easements.
- Someone asked how one finds the funding to maintain historic buildings, such as barns, that are no longer needed but contribute to the cultural landscape.
- As an added preservation strategy for historic properties, the Reserve should consider a tax abatement program at the town or county level, which would provide incentives to property owners through tax credits or other incentives. The Reserve should also explore the possibility of federal tax credits.
- The Reserve should provide technical support for owners who would like to upgrade their historic houses for energy efficiency, but in keeping with historic regulations.

Natural Resources

- The Reserve needs to develop a workable technical assistance program for both natural and cultural resources.
- Several commentors mentioned the importance of hedgerows and the need to maintain them in cooperation with the county. Landowners who protect them could be offered financial incentives.
- The Reserve should protect botanical resources through easements and eliminate noxious weeds such as poison hemlock.
- A commentor mentioned the need to preserve or restore the existing prairie fragments. The Reserve should first identify them and then develop a plan to encourage landowners to preserve them.

- The Reserve needs a formal arrangement with Seattle Pacific University to continue to operate and maintain the tide gate at Crockett Lake. It needs to be repaired so that it operates properly.
- Someone asked about the role and management of fire.

Recreation

- Most of the recreational comments were concerned about trail use. Trails need to be carefully planned, implemented, and managed; people need to be educated about appropriate trail uses.
- Many would like to see the trail system enhanced with better signage.
- Trails could be developed across The Nature Conservancy's property, and the north side of Crockett Lake (for bird watching).
- A continuous multi-use, non-motorized trail could link with existing Reserve, state, and county trails including Fort Ebey and Fort Casey state parks, the Kettles, Ebey's Landing bluff, Crockett Blockhouse, Rhododendron Park and Coupeville.
- Some trails need to be relocated and some uses prohibited at certain locations (such as bicycling on the bluffs).
- The Reserve should establish a trail for people with disabilities.
- A few commentors were concerned about noisy activities on Penn Cove, specifically the use of personal watercrafts (jet skis) and floatplanes.
- Someone mentioned the need for better boat access to Penn Cove.



Hikers in the Reserve, Whidbey Island, ca. 1999. NPS Photo.



Penn Cove Water Festival, Coupeville Wharf, Whidbey Island, ca. 2000. NPS Photo.

- The Reserve could have groups such as Whidbey Audubon lead nature field trips within the Reserve.
- Many people recognized the importance of bicycles in the Reserve, both to reduce traffic and as the best way to see the Reserve. This would involve having access to conveniently located and well-designed bicycle racks.
- Someone suggested that the Reserve subsidize a short-term bicycle rental program in Coupeville until the idea becomes profitable for the private sector.
- The Reserve needs to better understand the sport requirements of certain recreational activities, such as paragliding and horseback riding and their impacts. Someone asked what types of uses are appropriate within the Reserve and how they affect private landowners.

Parking and Transportation Issues

- Several commentors mentioned the need for more parking at Ebey's Landing; others were concerned about the impacts of additional parking there. Many suggested not to expand the lot but to consider off-site parking for overflow at the Coupeville Park-n-Ride lot. The Reserve should encourage visitors to use a bus, shuttle system, or trail from town to the landing.
- Many respondents were concerned about vehicular traffic and its impacts; one commentor did not want to encourage large tour buses through the area.
- Someone mentioned that some roads are poorly maintained. The county should consider road enhancement projects.

Native American Activities

- Several commentors would like to establish a tie to the Native American presence. Indian tribes should participate because they are important to the history of the area.

Staffing and Administration

- Most of the issues discussed involved the current inadequacy of staffing, but many commentors would not like to see the Reserve get "too bureaucratic." The Reserve should find a way to share staff with other partnering agencies.
- Many commentors mentioned the need for additional staffing, volunteers, and funding.
- The Reserve needs a separate administrative office with educational displays.

Boundary and Land Protection

- Several respondents suggested that the existing Reserve boundary be expanded to include Smith Prairie, the Navy Outlying Landing Field, and the pheasant farm (former Washington State Department of Fish and Game property), and the proposed gravel mine. Another commentor suggested no boundary expansion.
- Many respondents see land protection directly connected with keeping agriculture viable.
- The Reserve should prioritize key areas for land acquisition.
- Someone suggested purchasing the Jenne farmstead for offices and a museum.
- One commentor suggested that the National Park Service should be directly involved in land negotiation, not the Reserve Trust Board or staff.
- Several comments were made regarding conservation easements—reducing the tax burden, acquiring specific lands more quickly and better managing the terms of the agreement.
- The Reserve needs a new land protection plan to help determine what lands to buy in fee and what lands to buy in easements.
- The Reserve should buy private property at Keystone Spit as it becomes available since it may be the last natural occurring spit on the island.

- Someone suggested that the Reserve could approach wealthy individuals or groups to set up a land protection fund. Another suggested that land be put in a private land trust.
- The Reserve could provide an emergency-funding source for parcels in peril.
- The NPS budget needs to be increased to provide for a greater administrative role to maintain the historic setting. Money could be allocated to specific programs supporting agriculture, such as land lease subsidies and more development easement purchases.

Planning

- The town and county need to have compatible historic preservation regulations.
- One commentor stated that mobile homes should not be in the Reserve.
- The plan should ensure coordination of management of land within the Reserve between different owners.
- The Reserve should not overly restrict or regulate land.
- Someone asked what types of easements are available for land and buildings.
- One respondent suggested extending the historic overlay district within town of Coupeville.
- One commentor perceived a contradiction between Reserve goals and the Washington State Growth Management Act. The town of Coupeville must absorb more growth within its town limits, but historic lots are larger and more appropriate than zoned smaller lots. If growth occurs outside Urban Growth Boundary, then there is loss of farmland.
- The plan should integrate the preservation efforts of the newly acquired Nature Conservancy property into the Reserve plan.
- There were many questions asking about the following: tax incentives, conservation easements, zoning restrictions, open space, tax debt, and different agency regulations.
- Other questions centered on the GMP and whether it would change types of uses, and what baseline surveys had been done.
- The plan should make recommendations for land protection that are outside the scope of NPS planning that could be implemented by others.
- Someone asked if preservation is reliant on local government administration or regulation then should not the Reserve have representation on local government boards and commissions.
- One commentor recommended strengthening land use laws within the Reserve.

Visitor Orientation and Experience

- Many of the commentors expressed the thought that the beauty of the Reserve should be protected and the land kept less developed and regulated. However, others stated that central Whidbey is reliant upon tourism—change will happen, visitor use will grow, and that growth will need to be accommodated in an acceptable and sensitive fashion.
- The Reserve could develop an information station or kiosk for visitors arriving by car or boat at the Reserve and display maps and brochures containing basic information on trails, lodging, and food.
- The Keystone Ferry dock restaurant could serve as an interpretive center to interpret the importance of Crockett Lake to migratory birds. Visitors could be encouraged to delay their ferry connection and tour the Reserve.



- A few respondents were concerned about people management issues, such as volume of visitors and the potential for trespass on private property. Someone suggested that better signage would help.
- Many mentioned the need for the agencies (partners) to work cooperatively together.
- Coupeville is part of the Reserve and a “living landscape”. The town could be used as the Reserve’s information center and a place to leave cars and rent bikes to explore the area. Commercial use should be focused in Coupeville.
- One commentor stated that people need solitude on the bluff trail.
- The Reserve needs to develop a constituency for public support.
- To disperse visitors and avoid crowding, the plan should locate any new facilities in outlying areas.
- Someone mentioned the need for a visitor survey and asked how many visitors visit the Reserve.
- The plan needs to look at carrying capacity for visitors and facilities; find a balance between preservation and recreation.
- Someone asked what the plans are for using concession businesses, promoting marketing, developing visitor centers, and rehabilitating the Ferry House in the Reserve.
- The Reserve could provide free bus tours beginning on weekends only and staffed with interpreters. The route could follow the route in the “Driving and Bicycling Tour” brochure.
- The Reserve needs to balance visitor needs to local populace needs.
- The visual impact of traffic is a concern to some commentors.
- One commentor suggested limiting “invasive” presence of docents, signs, fences, and paving, and to continue the dogs-on-leash policy.

Interpretation and Education

- Many commentors wrote or spoke about the new concept of a national “reserve”, how it differs from a traditional national park (“it’s a living landscape”), its complexity, and how it is interpreted and perceived by the public. Some mentioned the need to educate not only the local community but also national constituents as well about this new concept.
- There were many ideas about what to interpret in the Reserve—the history, heritage of homesteaders, Native American use of the area, and native plants and animals—and many ideas of how to interpret the Reserve—more waysides, a museum, an amphitheater, discussion seminars, workshops, guided tour buses, interpretive beach walks, a farmer with horses tilling fields, informational plaques at significant sites for self-guided tourists, and interpretive signs for agricultural fields, trails, and historic structures.
- Several people mentioned the role of the local community in helping to establish the Reserve, the “pride of roots” and local heritage.
- Someone mentioned that current history has a role in future interpretation.
- There is a need to network with other Pacific Northwest historical institutions and communities and to collect oral histories.
- A few commentors suggested de-emphasizing signs and exhibits and voiced concern about providing interpretive facilities, interpretive rangers, visitor orientation space, and educational staff.
- The Reserve should have the Washington Native Plant Society prepare a plant list for the Reserve or at least the bluff area.
- One respondent suggested that the theme for the Reserve be “A Quiet Presence”.



- The Reserve could promote one-day workshops, which incorporate the goals and purpose of the Reserve with groups such as Whidbey Tilth Society or Island County Agriculture Extension Service, and work with organizations such as Au Sable Institute for educational and scientific purposes.
- The Reserve should promote its website.

Agricultural

- Most of the comments on agriculture stated the desire and need to keep Whidbey agriculture viable, the need to preserve farmland, and that doing so will preserve the history, beauty, and rural character of the area. Many spoke and wrote of the difficulty of living off the land because of the realities of economics, environmental, and regulatory issues.
- The Reserve should assist and support farmers and farming such as considering funding land leases to augment farming operations.
- Someone asked if the economic model of the Reserve needs to be evaluated. Can the Reserve survive in the face of changing economic conditions? Can it do this without NPS having a significant ownership role? The pressures on local farmers to sell out and local businesses to expand are only going to increase.
- Another commentor asked what would happen if there were an action affecting property that has two conservation easements from two different organizations on the same piece of property.
- The Reserve should consider the importance of farms located on other areas of the Reserve (north cove) in addition to Ebey's Landing area.
- The Reserve should allow flexibility in converting historical agricultural buildings to other uses and in agricultural practices.
- Changing agricultural uses have occurred over time, creating an evolving landscape.
- Someone asked what types of agriculture or other land uses will be viable in the future to retain the agricultural scene.
- The Reserve is unique. Landowners are the real Reserve managers and farmers have an important role to play. More coordination is needed.
- Through education programs, the Reserve could help farmers establish a product mix including organic farming, fruit stands, ponds, and specialty items for restaurants.
- The Reserve should be involved in preserving historic farmland.
- What can the Reserve learn from other countries such as England?
- The Reserve plan should explore the applicability of the Midwest Soil Banking Program.
- If over time, there is a transition to all public lands within the Reserve how will that affect the agricultural community? The look of agricultural land is an important part of Ebey's Landing.
- Someone asked how land would be managed in the Reserve if agriculture were no longer viable.
- It is important that the plan should strive to preserve the seamless quality between public and private lands.
- The Reserve plan should explore ways for the tax base to support agriculture. Taxes should support "paying for the view".
- There is always potential for conflict between farming and other uses such as residential. The Reserve could have a role in educating people about farm practices.
- The Reserve should add more emphasis on agriculture. It is part of the history, character, economic viability, and draw of the landscape. The Reserve partners should include a statement on agriculture in the Reserve's purpose and significance statements, interpretive themes, and desired future conditions.
- Someone asked if Island County has a "Right-to-Farm" ordinance to protect farmers.
- The Reserve Trust Board should continue to pursue acquisition of development rights and viewshed protection where there is a threat to the integrity of the Reserve.
- Someone in agricultural production should be on the Reserve Trust Board, or at least serve in an advisory capacity. Is there a role for the Board in local agriculture?
- It is critical that the Reserve Trust Board and staff communicate well with landowners.
- Communication is important between all agencies and landowners involved within the Reserve.

- One commentor suggested that the National Park Service should be directly involved in land negotiation, not the Reserve Trust Board or staff. The Trust Board should have a role in agricultural issues, involvement in agricultural education, promotion of new uses, and exploring grant opportunities.
- The plan should reconsider and reevaluate the role and function of the Trust Board. It may be possible and advantageous that some board members serve as representatives to other boards, including local government.
- One commentor stated that the NPS and Trust Board should advocate for the Reserve in other forums and take a stand on controversial issues. The Board should promote openness using e-mail, advisory groups, and agendas. The Board should be involved in the political process and lobby the county to strengthen design review.
- When board vacancies open, someone asked how this information is made public.
- The public needs to understand the function and role of the Trust Board and have better communication about Trust Board activities and board position openings.
- The Trust Board needs knowledgeable staff and an administrative site; the Board needs to get involved in issues early and to seek advice from others.
- The Trust Board should create an agricultural baseline inventory of what is important within the Reserve.

Though many new actions and ideas were suggested by the public during the public comment period, no new issues were identified.

Distribution of Draft GMP/EIS

On August 18, 2005, the NPS mailed 230 copies of the draft GMP/EIS to agencies, governmental representatives, organizations, and interested individuals. Copies of the draft GMP/EIS were placed in the Coupeville Public Library for public review.

A Notice of Availability was published in the *Federal Register* on August 26, 2005 (Volume 70, Number 165, page 50347) noting the release of the draft GMP/EIS for public review. A revised Notice of Availability was published on September 13 (Vol-

ume 70, Number 176, page 54104) extending the public comment period until December 1, 2005. All comments received through December 15, 2005 were included in the official record.

The NPS and Reserve staff placed advertisements announcing locations, times, and dates for public meetings in the Puget Consumer Cooperative *Sound Consumer*, in Seattle, Washington, the *Whidbey News-Times* in Oak Harbor, and the *Coupeville Examiner* in Coupeville, Washington. Press releases were sent to the following local and regional newspapers announcing the release of the draft GMP/EIS and dates, times, and locations of public meetings: *Coupeville Examiner*, *Whidbey News-Times*, *Everett Herald*, *Anacortes American*, *Skagit Valley Herald*, *Journal of the San Juan Islands*, *Bellingham Herald*, *MarketPlace*, *South Whidbey Record*, *Peninsula Daily News*, and the *Sequim Gazette*.

A total of 2,000 newsletters were printed containing a summary of the draft GMP, and also announcing the public meetings. Each newsletter included a postage-paid return form for public comments. Newsletters were available at the following locations: Island County Planning Office, the Town of Coupeville Planning Office, the Coupeville Public Library, Island County Historical Museum in Coupeville, and Fort Ebey and Fort Casey state parks, the Coupeville Post Office, Coupeville Wharf, Coupeville Arts Center, the Oak Harbor and Coupeville Chamber of Commerce offices, local restaurants and other Coupeville businesses. Additional copies were also available at the Reserve's Trust Board office.

News articles featuring the public meetings and release of the draft plan were written and published in the following newspapers: *The Whidbey News-Times* and *The Coupeville Examiner* on Whidbey Island, and in *The Sound Consumer*, in Seattle, Washington.

Public Meetings on Draft GMP/EIS

The NPS and the Reserve's Trust Board and staff held three public open houses. The purpose of the meetings was to provide an opportunity for the public to meet with Reserve Trust Board members and staff, and NPS staff to discuss the draft GMP/EIS and provide comments.

An evening meeting was held in Seattle, Washington, at the Flagship REI building on September 12, 2005. Six people signed in and 19 comments were recorded. In Coupeville, Washington, two meetings were held on September 15 at the Coupeville Recreation Hall. Sixty-eight people attended and 160 comments were recorded.

Written Comments and Responses

At the close of the public comment period a total of 51 pieces of written correspondence had been received by the planning team in response to the draft GMP. Total correspondence received included 21 letters from agencies, organizations, and individuals, 11 "return forms" from the draft summary newsletter, and 19 electronically mailed responses through the Internet from the park's posted website and emails to the park.

The comments were all received from Washington State, and a majority of comments were from Whidbey Island. The following agencies and organizations commented on the draft plan:



Public Scoping Meeting in Coupeville, Whidbey Island, ca. 2000. NPS Photo.

- U.S. Environmental Protection Agency, Region 10, NEPA Review Unit
- Washington State Department of Transportation
- Washington State University Island County Extension
- Island County Board of Commissioners
- Town of Coupeville, Washington (Town Planner)
- Central Whidbey Island Historical Review Committee
- Whidbey Environmental Action Network
- Washington Sustainable Food and Farming
- Au Sable Institute of Environmental Studies
- Coupeville School District

As part of this planning process, consultation was held with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, Washington State Historic Preservation Office, and the Advisory Council for Historic Preservation. No written comments were received from these four agencies. In addition, no written responses were received from area tribal governments.

Summary of Public Comments

The following is a summary of the topics receiving the most focus from both written and oral comments. All comments received were reviewed and considered by the NPS staff in the preparation of this final plan and environmental impact statement. Comments were grouped into 13 broad categories, and of those categories, seven major areas of emphasis emerged from the comments.

- Twenty-one comments expressed preference for one of the alternatives presented.
- A majority of those who commented supported the preferred alternative proposed in the draft plan.
- Comments expressed support for historic preservation in the Reserve, though there was a difference of opinion in the comments about whether strengthened design guidelines, zoning and other historic preservation measures in the Reserve were adequate.
- Comments expressed opposition to a proposal

in the draft plan that encouraged the county to establish an overlay zone and to provide additional zoning and/or regulatory restrictions in the Reserve.

- Comments expressed support for promoting and protecting viable agriculture in the Reserve. While there was broad support for continuing to protect and promote agriculture in the Reserve, comments did reflect an opposition to the plan's use of the term organic agriculture, and preferred emphasizing sustainable agriculture.
- Comments expressed support for broader partnerships for interpretive and educational opportunities in the Reserve.
- Comments expressed concern and questioned the operating costs and staffing levels proposed for the Reserve.
- Comments also expressed concern about private property rights and land use in the Reserve. These comments primarily focused concern on potential conflicts between visitor use, such as recreational trails and agricultural operations, or Reserve residents' private property and privacy.

Analysis of Substantive Comments on the Draft Plan

Consistent with the requirements of 40 CFR 1503, the NPS staff provided written responses to those pieces of correspondence that have either substantive comments or comments that the NPS planning team felt needed clarifying.

Substantive comments are defined by Director's Order 12, "Conservation Planning, Environmental Impact Analysis, and Decision-Making" (NPS, 2001) as those comments that:

- Question, with reasonable basis, the accuracy of information in the environmental impact statement
- Question, with reasonable basis, the adequacy of environmental analysis
- Present reasonable alternatives other than those presented in the environmental impact statement
- Cause changes or revisions in the proposal

Substantive comments raise, debate, or question a point of fact or policy. Comments in favor of or against the Preferred Alternative or alternatives, or those that only agree or disagree with NPS policy, are not considered substantive.

NPS and Trust Board Responses to Comments from Correspondence

The section that follows contains comments which contain substantive points regarding information contained in the draft GMP/EIS or comments that need clarifying. Comments and their responses are organized by topic heading to help guide the reader. In most cases, an individual substantive comment is followed by a direct response. For subjects that received more than one substantive comment, the issue has been summarized in a concern statement. A representative quote, or quote from a piece of correspondence that best represents the issue, is provided to the reader. The agency's response then follows.

Agency letters have also been reproduced in the final GMP and follow the "NPS Responses to Comments from Correspondence."

Substantive Public Comment Concern and Response Report on the Draft General Management Plan/Environmental Impact Statement

CULTURAL RESOURCES

Comments Oppose Strengthened Measures for Historic Structure Preservation

Concern Statement:	Comments oppose GMP recommendations calling for strengthened design guidelines, zoning, and permitting at the county level to assist with historic structure preservation, and state the analysis fails to recognize that the existing preservation measures in place are adequate.
Representative Quote(s):	“The draft GMP/EIS fails to recognize the achievements of the Historic Advisory Committee and the work that they have done. The HAC effectively administers an overlay designation where landowners are subjected to a different set of requirements than anyone else in the County. The HAC’s role is limited to making recommendations to the County, but the vast majority of those recommendations are incorporated into the permit approval making their input vital, useful, and effective.”
Response:	Thank you for your comment. Island County recently prepared new guidelines and standards under which the Historical Review Committee (HRC), formerly the Historical Advisory Committee, operates. While the HRC does have, in many cases, stronger language to employ, the recommendations from the committee remain advisory. There remain opportunities for strengthening the County’s role in preserving the cultural landscape, and the NPS and Trust Board would continue to support the County in implementing these measures. The GMP will be revised to reflect the revised Historic Preservation District Ordinance and the reaffirmation of design review through the newly named Historical Review Committee.

Comments Support Strengthened Measures for Historic Structure Preservation

Concern Statement:	Comments support stronger measures for historic structure preservation and state the document has understated the urgent need for action for preserving historic structures.
Representative Quote:	<p>“My comment is that I can observe the dramatic urgency for protecting and conserving one of the primary and significant elements of the cultural landscape – the historic structures. I read words in the GMP such as stabilize, protect, rehabilitation,, work with, ... guidelines, outreach programs and the like for all three alternatives. But to me they do not reflect the seriousness form immediate and comprehensive action for the overall preservation of the structures. What I kept looking for were actions that include the substance and background for subsequent urgent preservation decisions and implementation such as:</p> <ul style="list-style-type: none">• Comprehensive inventory of heritage resources; ranking by levels of significance• Analysis of structure conditions – by structure, clusters, and overall• Emergency and immediate stabilization needs• Prioritized short and long term preservation actions and plans• Comprehensive documentation• Preventive maintenance program• Building specific guidelines and technical assistance for caring for the building fabric

- Preservation plans with rationale for each of the structures – NPS and private
- Strong program for public understanding, education, support and involvement

Perhaps these have already been carried out or are implied. But to me the draft document statements (and ultimate management of the resources) needs to contain specific and direct actions rather than fuzzy words.”

Response: Thank you for your comment in support of stronger measures for historic structure preservation. Historic buildings and structures are a key and integral element of the cultural landscape of the Reserve. The NPS and Trust Board have no authority over privately-owned property within the Reserve, including buildings and structures. In an effort to promote the protection and preservation of the historic properties in the Reserve, the NPS has completed a historic building inventory and amended the National Register nomination form for the Central Whidbey Preservation Historic District/Ebey’s Landing National Historical Reserve to identify contributing properties within the Reserve. The NPS has spent funds stabilizing and preserving historic properties under its ownership, and will continue to do so as long as the properties are under federal ownership. The NPS has recently funded a Historic Structures Preservation Guide, which will provide technical assistance to owners of historic properties in the long-term care and maintenance of their properties. The NPS has funded a Historic Preservation Plan for the town of Coupeville which is being implemented, and a Historic Barn Inventory is underway which will document, evaluate and assess the condition of these important agricultural complexes. Alternative B calls for the NPS and Trust Board to develop a land use tracking system that will monitor changes in the Reserve; this data will assist the partners in understanding impacts to the Reserve, if any, and how to address those impacts at the local level. The NPS and Trust Board will continue to provide technical assistance in the area of historic preservation and will work closely with its partners to research, prepare and distribute widely studies, reports, and other publications that are deemed necessary to further the protection and preservation of this nationally significant landscape. The GMP will be revised to include information that clarifies the NPS’s role in the preservation of private property and the role of private property owners in the preservation and protection of the Reserve’s historic buildings, structures, and landscape.

NATURAL RESOURCES

Comments Provide New or Corrected Information for Natural Resource Management

Comment 1: “We strongly support the proposed expansion of the Reserve boundaries but believe they do not go far enough on Smith Prairie.”

Response: Thank you for your comment regarding Reserve boundary expansion in the Smith Prairie vicinity. The planning team for the general management plan reviewed the proposed land additions and ownership for Smith Prairie. Though it would be ideal to protect the entire prairie ecosystem there, it is not possible due to the large number of private holdings. The most intact portion of the prairie has been included within the proposed boundary.

Comment 2: “Including the eastern Crockett Lake wetlands is essential to achieving ecologically rational management. This area is currently undergoing serious and rapid invasion of

the high salt marsh by the non-native plant species *Epilobium hirsutum* (Hairy Willow-herb). This invasion is occurring both in- and outside of the current Reserve boundaries. The geographic spread of these plants appears to be at an exponential rate. Left unchecked, I believe this species will colonize at least the entire zone now occupied by *Potentilla anserina* (Pacific silverweed). This past summer, I located a small patch of this species on the northwest margin of the lake near the Ferry landing, the first time it has been detected on that side. This is an ecological catastrophe in the making, especially considering the high volumes of vehicular traffic through this area which can act as vectors for spread of seed throughout western Washington and southern B.C. This invasion is of such magnitude and rapidity that it needs to be disclosed and discussed within the DEIS.”

Response: Thank you for your comment regarding the noxious weed threat to the Crockett Lake wetlands. Language has been added to the final GMP in the “Affected Environment” chapter under the heading “Exotic Plants and Noxious Weeds” to clarify this information.

Comment 3: “In discussions of special status species the DEIS inexplicably omits *Aster curtus* (*Seriocarpus rigidus*) (White-topped aster). This species is considered by the U.S. Fish and Wildlife Service as a “Species of Concern,” it was formerly classified as a “Candidate” species for listing pursuant to the federal Endangered Species Act: It is listed by the Washington Natural Heritage Program as “Sensitive.” The small occurrence at Schoolhouse Prairie is the only known location on Whidbey Island and within the Reserve. Discussions of special status species, including explicit statements favoring and supporting conservation and restoration should include this species as well as *Castilleja levisecta* (Golden paintbrush).”

Response: Thank you for your comments and updated information regarding *Aster curtus*. Language has been added to the final GMP in “Affected Environment” chapter under the heading “Sensitive Species” to clarify this information.

Comment 4: “The EIS incorrectly refers to this species as having been designated for control by Island County (3-44). While designated as a “Class C” weed by Washington State, the Island County Noxious Weed Board has to date not designated this species for control in Island County. Under Washington’s noxious weed statutes, this local designation is necessary or there is no requirement for control. As a practical matter, without designation, state and local resources for control are considerably harder to obtain.”

Response: Thank you for your comment. The GMP/EIS has been revised to include support for an active listing effort with the ICNWB, in the “Preferred Alternative”, under “Vegetation.”

Comment 5: “*Phalaris arundinacea* (Reed canarygrass) is reported as present within the Reserve. 3-44. I am curious as to the source for this report and the location. *Ammophila arenaria* (European beachgrass) is also listed as present within the reserve. 3-48. I am not aware of the presence of this species on Whidbey Island other than at West Beach at Deception Pass State Park. I am curious as to the source for this report and the location. Since presence of either of these species is highly problematic, I recommend that if they occur within the Reserve and the occurrence is still small that they be promptly targeted for control.”

Response:	Thank you for your comment. One small stand of <i>Phalaris arundinacea</i> has been identified at on the eastern end of Crockett Lake near the road (Leigh Smith, pers. comm., 2005). Source information for <i>Phalaris</i> and <i>Ammophila</i> was provided by the Island County Noxious Weed Board Coordinator, Susan Horton. These populations will be targeted for control in 2006.
Comment 6:	“Inexplicably, this species [<i>Epilobium hirsutum</i>] is not mentioned in the discussion of noxious weeds at 4-176. Considering that this invasive now likely occupies a larger contiguous area than any other single invasive within the Reserve and the species was unreported within the Reserve before 1999, this omission should be corrected.”
Response:	Thank you for your comment regarding <i>Epilobium hirsutum</i> . This species will be added to the GMP/EIS, in the “Environmental Consequences” chapter, under the “Vegetation” heading, under “Cumulative Impacts”. Please also note the response to Comment #2, above.
Comment 7:	“The EIS states that “There are only two remaining glacial outwash prairies in the northern Puget Sound region and one is Smith Prairie.” 1-4-5, also, at 3-40. 4-174 This is arguable depending on how prairie is defined (i.e. size and dominance of native species). However, the practical result is the same: Native Puget Lowland grasslands are one of the most endangered types of ecosystems in Washington State. There are <u>very few</u> remaining glacial outwash prairies in the northern Puget Sound region and one is Smith Prairie. This site (on land owned by Au Sable Institute) contains a rare, five-acre intact prairie plant community <u>which is likely the largest and highest quality remaining in the northern Puget lowlands.</u> ”
Response:	Thank you for your comment. Language will be added to the GMP/EIS to accentuate the rarity of the AuSable prairie remnant.
Comment 8:	“ <i>Carex tumulicola</i> is reported as being abundant on the Au Sable land on Smith Prairie. 3-41 It is not. Both <i>C. tumulicola</i> and <i>C. inops</i> are present. I would term neither abundant at that site, certainly not in the sense that <i>C. tumulicola</i> is abundant at Schoolhouse prairie or <i>C. inops</i> is locally abundant on Ebey’s Bluff.”
Response:	Thank you for your comment regarding the abundance of <i>C. tumulicola</i> at the AuSable prairie remnant. The information regarding its abundance at the site was provided in 2003 by Steve Byler, who at the time was conducting a vascular plant survey of the site.
Comment 9:	“On 3-41 the EIS states in reference to the prairie remnant on the Au Sable land: The area qualifies as an “element occurrence” ... listed in Washington Natural Heritage Plan as a “priority 3” for protection. It has also been proposed for addition to the National Vegetation Classification as an Idaho fescue—common camas—field chickweed association by Frosty Hollow Ecological Restoration, a Whidbey Island consulting firm. A total of four plant associations representing Puget lowland dry grasslands have been identified, and are included or proposed for addition to the National Vegetation Classification All four of these associations are considered globally, critically impaired. This is confusing The <u>National</u> (not <i>natural</i>) Vegetation Classification system already includes the Idaho fescue—common camas—field chickweed association. Frosty Hollow has not proposed creating such a classification, rather, based on field data, Frosty Hollow concluded that the occurrence fits within this association. Citation should be made to the Washington Natural Heritage Plan Finally. I suggest that the reference to

Frosty Hollow be done in standard format. i.e.:
~~The area qualifies as an ‘element occurrence’ . . . listed in Washington natural Heritage Plan as a “priority 3” for protection. It has also been proposed for addition to the Natural Vegetation Classification identified as an Idaho fescue—common camas—field chickweed plant association by Frosty Hollow Ecological Restoration, a Whidbey Island consulting firm. (Frosty Hollow Ecological Restoration, 1999.)~~ The area This association is qualifies as an “element occurrence” . . . listed in Washington Natural Heritage Plan as a “priority 3” for protection. (Washington Natural Heritage Plan. Wash. St. Dept of Natural Resources. 2003.)”

Response: Thank you for the clarification of this paragraph. The GMP/EIS will be revised to reflect your comments, in the “Affected Environment” chapter under “Vegetation”.

Comment 10: “The EIS incorrectly states that there are only two remaining “old growth or original forests on the Reserve.” 3-40. Actually there are three. The forest patch at Rhododendron Park has two cohorts of trees, respectively —150 and 350 years old. Because the soils on the site are so poor, these trees are relatively small; however, they are still of great age. More information can be obtained from Chris Chappell, Vegetation Ecologist for the Washington Natural Heritage Program. This site qualifies for inclusion in the Washington natural heritage system.”

Response: Thank you for your comments regarding old-growth forest remnants within the Reserve. The GMP/EIS will be revised to include your information.

Comment 11: “The portion owned by the Dept of Natural Resources has been transferred to Island County. Within 2 years of the final transfer, the County proposed extensive logging of the ancient and ecologically rare forest, including complete deforestation of a portion for new sports play fields. This effort as turned back by prompt and overwhelming public opposition - for now. The DEIS should disclose that this ecological important forest has no protection and is threatened by recreational conflicts. Assuring conservation of this forest (and the forest at Camp Casey) should be an explicitly stated goal of the GMP.”

Response: Thank you for your comment regarding preservation of ancient trees. As you know, the NPS has no jurisdiction over the management of privately or publicly held lands and resources within the Reserve, other than those owned in fee by the NPS. However, throughout this GMP/EIS there are references to advocating sound stewardship practices and management of sensitive resources such as remnant old-growth trees, and working with public and private partners to that end. Additional language to this effect will be added to the GMP/EIS in the Alternative B-Preferred Alternative, under the heading “General Description”.

Comment 12: “Also, at several places, the EIS refers to the Heritage Forest at Camp Casey as a “Natural Heritage Forest Area” 3-40. While this forest patch has been adjudged by the Washington Natural Heritage Program as qualifying for listing on the Washington Register of Natural Areas, this action is voluntary on the part of the landowner. To date, Seattle Pacific University has not applied for the site to be registered or made any commitment to its conservation. I suggest rewording these references as:
forest qualifying for listing on the Washington State Register of Natural Areas.”

Response:	Thank you for this information. The GMP/EIS will be revised to reflect this change, wherever the SPU forest is mentioned.
Comment 13:	“At several places, the EIS refers to “unique” plants. 3-40 (“...along the bluffs where unique flat-leaved cacti (<i>Opuntia fragilis</i>) occur.”)Also, 3-44, 4-181. “unique” means one-of-a-kind and is not a term that is generally used by botanists or ecologists except for the most, er, “unique” circumstances and situations. These plants and their communities are regionally rare and in some cases disjunct (i.e. <i>Opunllafragifli.s</i> }, but not “unique.”
Response:	Thank you for providing this valuable distinction of terms. The GMP/EIS will be revised to reflect this change.
Comment 14:	“ <i>Castilleja levisecta</i> (Golden paintbrush) is listed by the state as <u>endangered</u> , not threatened.”
Response:	Thank you for the information regarding the state classification of <i>Castilleja levisecta</i> as endangered. The GMP/EIS will be revised to reflect this fact.
Comment 15:	“The discussion of <i>Iris missouriensis</i> (3-4 1) should disclose that this is the only known occurrence remaining west of the Cascade Mountain Range crest in Oregon. Washington, and Oregon.”
Response:	Thank you for your comment regarding the rarity of the <i>Iris missouriensis</i> population on Grasser’s Hill. The GMP/EIS will be revised to reflect this information.
Comment 16:	“There are eight reported occurrences [of <i>Carex tumulicola</i> on] central Whidbey. including Grassers Hill Schoolhouse Prairie. (Erickson 2004).” 3-41. One of these occurrences (at the West Beach Rd. <i>Castilleja levisecta</i> site) is outside of the Reserve. This site is also referred to at 3-44.”
Response:	Thank you for the information regarding the location of the 8 occurrences of <i>C. tumulicola</i> on central Whidbey Island. This information will be added to the Natural Resource files at the Reserve.
Comment 17:	“One occurrence of Grass Widow (<i>Sisyrinchium bellum</i> ,) is known on central Whidbey. It occupies an area of several hundred square feet on upper portion of Grasser’s Hill Also located here are over 1,000 plants of the Chocolate Lily (<i>Fritillaria lanceolata</i> = <i>F. affinis</i>).” 3- 42. The <i>Sisvrhinchium spp.</i> is clearly within the <i>S. idahoense</i> complex, but which species needs additional clarification. This occurrence of <i>F. affinis</i> is one of only a handful known within the range of the species where it achieves this extremely high abundance (1000’s of plants). This density and high abundance are truly exceptional. <i>F. affinis</i> was regularly used as food by the aboriginal inhabitants, and the high abundance and density at this site may indicate long aboriginal use of the site for that purpose. (<i>Personal communication</i> , Linda Marsh. 2003.) Various other native herbaceous prairie species are also present at this site which include two five-acre parcels west of Skyline Drive, outside of the NPS scenic easement.”
Response:	Thank you for this valuable additional information regarding native flora on Grasser’s Hill. This information will be added to the GMP/EIS in the “Affected Environment” section referring to vegetation on Grasser’s Hill.
Comment 18:	“The EIS states that “The Whidbey Environmental Action Network (WEAN) has identified 33 rare local plants unique to Whidbey Island. Only one was recently given protection by the county. the blue flag iris (Douthitt, December 23, 2000).” See our previous comment regarding use of the word “unique.” This contains several inaccurate statements. The report ranking these species was by Frosty

Hollow Ecological Restoration, not WEAN 22 of the species were ranked as locally endangered, threatened, or sensitive, the remainder were proposed for monitoring, not designation (as species of local importance) and protection. *Iris missouriensis* (Blue flag iris) has still not been designated by the County and receives no formal protection from the County. Some of the landowners on whose land this species occurs have agreed to temporarily forgo, for the time being, damaging activities in exchange for a tax reduction. Not all land owners of land on which the species occurs have done this. Long-term protection is still not assured, as it would be if the NPS' scenic easement was enlarged and amended to explicitly protect this species. Also, note that the other native prairie species (i.e. the plant community) is only incidentally protected."

Response: Thank you for this information. This passage will be edited to correct the inaccuracies. The National Park Service is working with Grassers' Hill landowners to protect the *Iris missouriensis* plants and to monitor their status.

Comment 19: "The list of species on 3-40 ("common species of salt marsh and beach vegetation") is so mixed as to become a meaningless hodge-podge. It mixes three relatively well defined vegetation zones: salt marsh, littoral, and bluff face. It is also difficult to determine in all cases which species are referred to, since common names are used without any reference to botanical names.⁸ I suggest redoing this as several lists that include both botanical and common names and also suggest denoting which are non-native. A photo from Ebey's Bluff looking down at the lagoon and beach could be used to show the relative location of the three different zones (littoral, salt marsh, bluff face). Because this information is both intended for a non-technical audience and as a basis for technical description of existing conditions, changing the format in this way would increase its utility for both audiences. Though these species lists are not complete, anyone interested in more information can contact the Reserve."

Response: Thank you for your comment regarding the species list. Please note that while it is incomplete and uses common names, and mixes vegetation zones, it is only a representative list for the layman's use. Complete and detailed information for the advanced user is available from the NPS Resource Management office, and NPS staff.

Comment 20: "The list of "common hedgerow species" omits *Mahonia aquifolium* (Tall Oregon grape). 3-42 The three most common species by far are *Rosa nutkana* (Nootka rose), *Symphoricarpos albus* (snowberry), and *Mahonia aquifolium* (Tall Oregon grape)."

Response: Thank you for this comment. The GMP/EIS will be revised to include these valuable details, in the "Affected Environment", under the heading of "Hedgerows".

Comment 21: "The discussion of hunting within the Reserve (3-58) should be updated to include the island County Commissioners ongoing effort to open up the "Kettles" area to hunting and discuss the obvious user conflict."

Response: Thank you for your comment regarding hunting in the Kettles area. According to Island County officials, deer hunting has been allowed in the Kettles area since the early 1990's, for archers, black powder hunters, and rifle hunters. The season generally runs from late September through December.

The main Kettles non-motorized trail, approximately one and one-half miles long, is exempt from hunting for a distance of 150 feet on either side of the centerline, creating a 300-foot wide no hunting zone along this trail corridor. Island County officials are aware of potential conflicts, and during hunting season, expend great effort to warn trail users that this is a hunting area, to wear hunter orange and exercise caution.

To date, there have been no documented hunter/recreationists conflicts (personal communication, Terri Arnold, Island County Parks, June 13, 2006).

Comment 22: "Reference is made to potential impacts of climate change on the Reserve (3-30). For more up-to-date information, particularly modeling regarding expected rise in Puget Sound, contact the Climate Impacts Group at the University of Washington. <http://www.cses.washington.edu/cig/contact/contact.shtml>"

Response: Thank you for this comment. The GMP/EIS will be revised to include this information, in the "Affected Environment" chapter, under "Climate".

Comment 23: "Frosty Hollow Ecological Restoration is referred to as a "conservation group." 3-44. While Frosty Hollow's work is in furtherance of conservation, it is a private for-profit (at least theoretically) business."

Response: Thank you for this clarification. The GMP/EIS has been corrected.

Comment 24: "The reference to a "bio-blitz" in 2005 should be updated, since this did not happen. 3-102."

Response: Thank you for noting this error. The GMP/EIS has been updated.

Comment 25: "*The town of Coupeville has issued a moratorium on new water hookups within the town limits. Coupeville obtains its water from an infiltration gallery on the former Fort Case Military Reservation northeast of Crockett Lake.* – The highlighted portion is not correct"

Response: Thank you for your comment. The GMP has been updated to reflect this information.

Comment 26: "Prime and Unique Soils – Page 103 – Island County already restricts the ability to erect structures in areas where prime and unique soils are present."

Response: Thank you for your comment regarding prime and unique soils. Conversations with Island County staff in the Planning Department indicate that the County Zoning Ordinance and Land Development Standards contain provisions which discourage and sometimes prohibit incompatible development on prime soils. Applicable portions of the code are: ICC 16.17.060, ICC 16.15, ICC 17.03.180.

Comment 27: "Page 46 – Additional Reptiles and Amphibians recorded from Ebey's Landing National Historical Reserve include:

1. The Common Garter Snake *Thamnophis sirtalis* (Linnaeus) recorded from multiple sightings at Seattle Pacific's Casey Conference Center and Au Sable Institute. A road-kill specimen is at Au Sable.
2. Northern Alligator Lizard *Elgaria coerulea* (Wiegmann) recorded from the bluff west of the Pratt Preserve a N48 11'48.8", W122 43'10.7" (one specimen seen under a piece of plywood); a breeding population is also present at Au Sable Institute on Smith Prairie.
3. Rough-skinned Newt *Taricha granulose* (Skilton) recorded as a sizable breeding population in a small freshwater pond on the west end of Crockett

lake near Seattle Pacific's Casey Conference Center at N 48 10'06.9', W 122 40'36.0".

Response: Thank you for your comment regarding the presence of additional reptile and amphibians sighted within the Reserve. Please forward source and contact information to Ron Holmes at North Cascades National Park for confirmation. Ron is a data manager responsible for keeping records of sightings and voucher specimens for the Reserve. Ron can be reached at 360 856 5700 x370.; email Ronald_holmes@nps.gov. The above information will be filed at the Ebey's Landing National Historical Reserve, National Park Service resource management office at 144 Ft. Casey Road while corroborative information is sought.

Comment 28: "I am particularly excited about the discussion on page 180 regarding the guided management of the woodlots toward old-growth conditions. This area of discussion should be expanded to clearly identify in a map the areas involved and the total number of acres involved. Would it include the Pratt preserve (400 acres?), the county lands in forest (how large?) and all of the Fort Ebey State Park forest land (645 acres)? Would private lands be included? I also suggest that the significance of this be discussed in light of the very few remaining old-growth stands at low elevation. South Whidbey State Park and Deception Pass State Park are included in the rare remaining stands. What is the size of Deception Pass old growth for comparison?"

Response: Thank you for your comment regarding woodlot management. Information such as that requested in your comment will be included in detail in the revisions to the Reserve *Resources Management Plan*, where projects are identified prioritized for funding. This Plan will be revised in the near future, and copies will be available in the Trust Board and NPS offices at the Reserve.

Comment 29: "With only 684 acres of NPS-owned land and 2,023 acres of NPS conservations easements, the ability for the NPS to direct stewardship of the natural resources within the entire Reserve is limited. Alternatives B and C do, however, include elements to expand the role of the NPS in natural resource protection (p.iii). EPA supports this commitment to increased stewardship of natural resources via additional funding, collaboration, and monitoring activities. EPA believes that the GMP merits further clarification regarding these activities and contingencies for future monitoring of environmental indicators within the Reserve.

First, we recommend that the EIS include a better summary of those actions (e.g., via table or bulleted list) that will be pursued over the course of the 20-year life of the management plan related to stewardship of the natural resources."

Response: Thank you for your comment. Upon completion of the GMP/EIS, The Reserve Resources Management Plan will be undergoing revisions to reflect the action items identified in the Preferred Alternative. This Plan is a comprehensive, detailed document including project lists, prioritizing criteria, funding proposals, and identifying strategies such as those you have identified in your comment. The Reserve is also a cooperator in the North Coast and Cascades Inventory and Monitoring Network, comprised of 8 NPS units in western Washington and northern Oregon. Network partners are currently designing long term monitoring protocols for a wide variety of ecosystem elements, some of which will be implemented in the Reserve.

Comment 30: “Second, we recommend that the EIS clarify whether periodic reporting on natural resources is planned. It is not clear whether any natural resource monitoring reporting is part of the annual appraisal of management and operation of the Reserve per PL 95-625(e) (EIS, p.99) or other reporting. EPA recommends that an action items (similar to p. 110) be added to the EIS Alternatives B and C for preparation of a natural resource monitoring plan summarizing the various efforts that will be pursued over the life of the GMP.”

Response: Thank you for your comment. Please keep in mind that this is a *General Management Plan*; the current *Resources Management Plan* (ca. 1995) will include strategies addressing your concerns when it is revised, following the completion of the GMP/EIS for the Reserve.

Comment 31: “EPA recommends that preparation of a Natural Resources Monitoring and Implementation Plan be included in this list of action items that would catalogue all of the opportunities identified in the GMP, which will be pursued over the life of the plan. Since many activities are subject to obtaining funding, reliant on other entities for implementation, or are otherwise uncertain, a natural resources implementation plan would be a useful tool to identify and track the many stewardship opportunities that will contribute to the health of the Reserve. The Trust Board or NPS may choose to provide periodic reports to the public on its efforts that could help focus uniquely on the Ebey’s Landing Reserve.
By way of illustration, EPA lists many of the actions and opportunities that are mentioned in various places in the GMP, which EPA believes would be well-suited for including in the recommended Natural Resources Monitoring Plan.”

Response: Thank you for your comment. As described above, upon finalizing the GMP/EIS, the detailed Resources Management Plan will be revised to include the numerous action items identified in the Preferred Alternative. The “Preferred Alternative” has been revised to identify tracking, evaluating, and monitoring natural resources as an “Action Item.”

AGRICULTURE

Comments Provide New or Corrected Information on Agriculture

Comment: “Quote from Island Co. dairy agent is out of date – From 2000. Not currently accurate – suggests that dairies in the reserve do not comply with waste management rules.”

Response: Indeed, agriculture has been seriously impacted and is endangered within the Reserve, due to the result of low prices, loss of local crop processing plants, closure of support businesses, and impacts from urban sprawl (such as nuisance lawsuits, and vandalism). There are few alternatives for farmers to offset the increased liability issues. Newer installations or higher leveraged operations have a much higher cost of production and have been losing money heavily the last ten to fifteen years. According to the Island County dairy agent, the “last straw” was the mandated waste management facilities upgrades that were common in the 1980’s and 1990’s. They were very expensive and not financially possible for many smaller farmers, even with matching grant funds. The milk support program only becomes effective if the price gets below \$10.60 per hundred-pound weight (cwt) which is about \$1/cwt under the average cost of production. A disturbing trend is the increasing number of farms with net losses. Both in 1992 and 1997, there were more farms with net losses than farms with net gains, and the gap is widening.

Comments Express Support for Protection of Sustainable Agriculture but Oppose Emphasis on Organic Agriculture

Concern Statement: Comments question the justification for emphasis on organic agriculture as opposed to sustainable agriculture in the Reserve, and state that sustainable agriculture is more consistent with the purpose of the Reserve.

Representative Quote: “Why ‘advocate for organic and sustainable agriculture’? Organic agriculture is and will continue to be a small part of the agricultural economy of the U.S. If it becomes economically advantageous to be an organic producer in the Reserve, that will happen. Such a move should be driven by economics not someone’s ‘good idea’. As far as sustainable, most of the land on Ebey and Crockett Prairies is farmed by fourth and sixth generation farmers. If multi-generations of successive farmers is not sustainability, I do not know what sustainable means.”

Response: Thank you for your comment. References pertaining to “organic farming” have been changed to “sustainable farming” in the final GMP.

Comments Support the Return of all NPS-Owned Farms to a Private Farmer

Concern Statement: Comments support the return of all NPS-Owned farms to private farmer.

Representative Quote: “Of the three alternatives proposed in this plan I support Alternative A with the hope the NPS will get out of the property ownership business completely. Using available funding to purchase scenic easements leaves the management of these protected properties in the private sector minimizing the need for direct property management by reserve staff.”

Response: The NPS purchased Farm I and II from the Trust for Public Land with Land and Water Conservation Fund money, a fund source used for purchases to further resource protection. It is not the intent of the NPS or the Trust Board to be in the farm management business. The purchase is a temporary measure until a new owner (farmer) can be located. Both the Preferred Alternative and Alternative C propose exchanging both Farm I and Farm II to a farmer(s) protected with appropriate conservation easements, for similar easements on currently unprotected land elsewhere within the Reserve.

The West Ridge property was purchased from The Nature Conservancy and includes historic properties on the National Register and well as agricultural fields, and some forest. The Proposed Action (clarified by the NPS and the Trust Board since publication of the draft GMP/EIS) calls for NPS to retain ownership of this 60 acre property for public use and interpretation, to continue to lease the fields to a local farmer, and to eventually to relocate the Reserve’s maintenance facility adjacent to the Sheep Barn. This action would allow for greater flexibility in interpretation around the Jacob Ebey House, more efficient siting and management, and other opportunities for the Reserve.

Comments Support the NPS Retaining 5 Acres at Reuble Farmstead for Reserve Use

Concern Statement: Comments support the NPS retaining Reuble farmstead for Reserve use.

Representative Quote: “NPS owned buildings at the former Reuble Farmstead (farm 2) should be used as a possible preservation center to assist in providing training opportunities in building repair/preservation techniques but the farm land should go back into the private sector. If necessary or appropriate, lease the barn or other buildings out if it would assist the new property owner in his/her operations.”

Response: The option to retain approximately five acres of the Reuble Farmstead for the Reserve's maintenance facility was included in Alternative C. The Reserve's maintenance facility is presently located at the Reuble Farmstead and the NPS has been maintaining, utilizing, and caring for the historic barn and other historic structures within the farmstead over the last four years. However, it was not included as the Preferred Alternative since it has been the intent of the NPS and Trust Board to place the two intact farms (Farm I and Farm II) back into the private sector for agricultural use.

Comments Introduce the Concept of Using Farms as Models for Economic Development of Agricultural Lands

Concern Statement: Comments introduced a new concept of using farms as model for economic development initiatives that could be researched as a case study and applied to other agricultural lands.

Representative Quote: "The Farm 1 and Farm 2 properties could be a big help to local agriculture if they play a role in future economic development initiatives to provide value added opportunities to local growers. I encourage the Reserve to carefully consider the possibilities of the Farm properties during discussions about their ultimate disposition. At a minimum, I encourage you to place the Farms back into private hands to carry on their long farming tradition." (Letter #35)

Response: Farms 1 and 2 are currently operating under a Special Use Permit which will expire in March of 2008. Prior to that time, a decision will be made regarding the future of the Farms. As part of the decision making process to determine the disposition of both of the Farms, a clear and objective process will be developed for judging various proposals for the Farms' eventual ownership and use. It is anticipated that the potential role of the farms in future economic development activities will be one consideration in the decision making process.

Comments Question the Analysis on Causes of Agriculture Decline

Concern Statement: Comments question the plan's analysis of the causes of the decline in agriculture in the Reserve and state the plan has over-emphasized development pressures and not give adequate weight to the economic difficulty of continuing family farms.

Representative Quote: "Agricultural Resources – Page 49 – Paragraph 2 states that the loss of farm land "is due in large part to strong residential development pressure." The County questions the certainty in which this conclusion is made. As stated in the last sentence it is increasingly difficult for farmers to make a profit on agricultural land. The County has received testimony from the agricultural community who consistently states that they opt to sell their land because agriculture is no longer profitable. Testimonial accounts have not revealed that residential development is a pressure that forces farmers in to abandoning their lifestyle and selling their land for residential development. The County feels that it is irresponsible and inaccurate to make this statement for two primary reasons. First, agricultural operators are not being taxed off of their land which is the traditional reason behind development pressures being a cause for the loss of agricultural land. Second, the County adopted a right to farm ordinance in 1998 which requires that all land that is within 500 feet of an agricultural activity be subject to disclosure statements that are placed on property title which inform prospective buyers that there are nuisances associated with farming and that the County will not recognize complaints pertaining to normal agricultural activities. Farmers have consistently stated they have not

desired being squeezed out of the farming industry and that it is due to the lack of profitability, and costs/loss of land due to ever increasing land use regulations. If farming were more economically viable it would not matter what the underlying zoning designation is. This is demonstrated by the fact that the residential zoning designation existed within the Reserve for 32 years and which allowed between 6 and 3.5 dwelling units per acre. Despite this fact, there is still a substantial amount of that land that continued in agricultural use.”

Response: Several factors are leading to a decline in agriculture in the Reserve. In addition to broader trends such as changing market and labor conditions, the conversion of productive soils to non-agriculture uses is a factor. Farming operations in the Reserve have relied heavily on leased land to provide a flexible inventory of agricultural acreage available for agricultural production. As non-farming owners of this land convert its use to non-agricultural activities such as rural density housing, the options for active farmers are reduced. This occurs whether homes are built on newly created lots or on existing undeveloped parcels in the Reserve.

As blocks of farmland become isolated and disjointed, the efficiency with which they can be managed declines, adding additional costs and complexity to operating a farm in the Reserve.

Recent issuance of building permit applications have indicated a trend toward infill of existing parcels, often in older subdivisions, or smaller developments of lots, such as short plats and boundary line adjustments.

The statement that residential development pressures is a factor in the decline of farming should not be interpreted as a criticism of Island County land use policy, rather it is an acknowledgement of a social and market trend that is impacting farming.

INTERPRETATION AND EDUCATION

Comments Provide New or Corrected Information for Gateway Facilities

Comment: “Highway 20, north entrance to the Reserve – I could not find any maps or mention in the text concerning the North portal.”

Response: Unlike the two other gateway contact facilities (the southern gateway along state Route 20 in the Smith Prairie area, and the Washington State Ferry landing at Keystone or Port Townsend), a suitable location for the northern gateway has not been determined; however, many of the park visitors will arrive at the Reserve from the north so it is important to have a kiosk at this entry. The south gateway has been developed to greater detail (see Figure 15, South Gateway) because the potential to partner with AuSable Institute and the Island County already exists.

Language has been added to the final GMP in Alternative B under the heading “Gateway Contact Facilities” to clarify this information.

TRANSPORTATION, ACCESS, AND CIRCULATION

Comments Provide New and Corrected Information for Transportation

Comment 1: “p. 5, WSDOT Improvements – This section only speaks of WSF projects, yet other areas of the document discuss future highway projects as having potentially

substantial effects upon the Reserve. Broaden the description scope of WSDOT improvements.”

Response: Thank you for your comment. Additional summary language has been added to the “Background of the Reserve” chapter under the heading “Washington State Department of Transportation Improvements” to include highway projects. Detailed information on this topic can be found in the “Affected Environment” chapter under “Roads and Highways”, “Safety Improvement Projects.”

Comment 2: “p.5, Washington State GMA – The GMA also provides means for local comprehensive plans through the transportation element to coordinate with WSDOT on transportation planning and improvement projects. Emphasize more ways the GMA can facilitate the purpose and significance of the Reserve.”

Response: The Trust Board and the NPS would be aware of, and participate, as able, in the comprehensive planning processes of both Island County and the Town of Coupeville. This would enable the Reserve to be proactive in providing input to the Transportation Elements of both city and county comprehensive plans on proposed improvements within the Reserve. Since the Growth Management Act requires a public process through the State Environmental Policy Act, these planning processes would provide a forum for the Reserve to provide input as well as receive information regarding future transportation projects.

Comment 3: “p.70, Highway Level of Service Standards – The transportation projects described are safety improvement projects in response to a substantial number of accidents, which defines those sections of SR 20 as High Accident Corridors. The projects are not related to LOS improvement. Remove the project descriptions from the discussion of LOS.”

Response: Thank you for the clarification. The 2nd paragraph on page 70, (1st column) describing the safety transportation projects have been placed under a new heading called “Safety Improvement Projects” and the mention in the 2nd paragraph that these improvements are needed “to maintain LOS” on State Route 20 has been deleted.

Comment 4: “While I have no knowledge of whether WSDOT was invited to be a cooperating entity to the GMP EIS, only our Heritage Corridors office is listed on page 231. Additionally, WSDOT is not listed on the circulation list for this document.”

Response: Washington State Department of Transportation is not a cooperating entity to the GMP. However, WSDOT at the Dayton Avenue North address in Seattle has been added to our mailing list. In addition, Washington State Department of Transportation has been added to the “Summary of Public Involvement” chapter on page 232, “List of Agencies, Organizations, and Persons to Whom Copies of the GMP/EIS Were Sent,” under “State and Local Agencies and Officials.”

Comment 5: “p. 157, WSDOT SR 20 Realignment – WSDOT affirms the benefits of mutual understanding of agency mission and project impetus by establishing a better work relationship with NPS. The subject project is a response to high accidents in that corridor of SR 20 based upon existing traffic data and roadway design standards. Traffic science shows the arbitrary low speeds on a road designed for higher speeds, creates more stop conditions, which are unsafe and cause more severe injury type accidents than when operation speed is set within a

5-mph range of the road's design speed. In brief, higher speed conditions influence safer traffic. Realignment can improve sight distance and driver comfort through easier to maneuver curves, without increasing road speed. We can work with the NPS towards safer road conditions that "are in harmony with the purpose of the Reserve."

Response: Thank you for your comments and information. The NPS understands the mission of WSDOT to improve safety conditions on roads including the SR 20 corridor. The NPS embraces working with WSDOT to improve road conditions that meets safety needs while maintaining a road that is consistent with the purpose of the Reserve.

Comment 6: "p. 159, Mitigation Measures – Add a proactive measure to work with WSDOT to understand transportation planning implications of regional development to the Reserve."

Response: Thank you for your comment. A mitigation measure has been added that addresses coordinating and working with WSDOT to improve understanding of regional transportation planning and ensure transportation improvements provide safe thoroughfares while being compatible with the character of the Reserve.

Comment 7: "p. 172, Cumulative Impacts – WSDOT does not regulate traffic. State transportation standards are based upon USDOT and AASHTO regulations. Please correct and contact the Mt. Baker Planning Office for an informed understanding of how WSDOT works with regional transportation."

Response: Thank you for your comment. The document has been corrected and the erroneous statement that WSDOT regulates traffic has been removed.

Comment 8: "p. 203, Effects on Transportation Access, and Circulation, Methodology and Assumptions – The planned improvement projects for SR 20 at the Reserve would not increase traffic because they are not capacity or mobility projects. These safety improvement projects, are unfortunately, reactive to an existing traffic issue. WSDOT seeks to be proactive with transportation planning, however, in reality our projects are often a response to an existing need."

Response: Thank you for your comment and corrected information. The document has been updated to show that safety improvement projects are being designed in response to existing need and no longer implies that these projects will increase traffic flow.

MANAGEMENT AND OPERATIONS

Comments Question Staffing and Funding Justification

Concern Statement: Comments question the justification for expanding staffing and funding for the Reserve.

Representative Quote: "I question the extensive expansion of staffing for the Reserve that is listed in the Draft Management Plan. For example, since selling the NPS-owned farmland is a goal, is there truly a need for a full-time Maintenance Manager plus a Seasonal Maintenance Worker? What are the responsibilities of the Community Planner and would that person overlap with staff in the Island County Planning Department? Does a 17,000-acre Historical Reserve that is almost entirely privately owned really require a full-time Cultural Resources Specialist, Natural Resource Manager and Interpretation/Education Specialist?"

Response Thank you for your comment. The staffing section has been revised to provide added clarification regarding staffing numbers and functions and an additional breakdown of funding requirements for the Reserve. The total number of new staff positions for the Reserve has been reduced by one position.

RESERVE BOUNDARY

Comment Question Expanding Boundary without a Willing Seller

Comment: “Prior to amending the Reserve Boundary, Island County recommends that the owners of the described lands provide consent to their inclusion. It is likely that if the Reserve boundary is expanded that there will be a subsequent request to amend the Historic Advisory Committee (HAC) boundary so that the two are consistent. Landowners who are part of this expansion should be aware of not only the implications of being included in the Reserve, but also those associated with being located within the HAC boundary. Until there is universal agreement by all affected landowners the County opposes the expansion.”

Response: Prior to a final recommendation to expand the boundaries of the Reserve, all private property owners within proposed boundary expansion areas were contacted regarding the implications of owning land within the Reserve. The proposed boundary expansion area has been modified to reflect the final concurrence of land owners willing to be included in the proposed revision to the Reserve boundary.

LAND PROTECTION

Comments Provide New or Corrected Information for Land Protection

Comment 1: “The current maps in the GMP indicate Au Sable Institute’s property as being public land – make sure to specify what the map is saying (don’t want to mislead the public.)”

Response: Thank you for your comment. Changes have been made to Figure 15 on page 130 to clarify ownership.

Comment 2: “Town of Coupeville Comprehensive Plan... Comment – Last updated in 2003”

Response: Thank you for your comment. The change has been made regarding the update.

Comment 3: “The Town adopted a Cottage Housing Overlay District which is subject to Design Review.” [Not “Cottage Housing District”]

Response: Thank you for your comment. The GMP has been updated to reflect the newly adopted Cottage Overlay District.

Comment 4: “Land Protection Methods — Page 108 — In the third paragraph it is stated that the Rural Zone constitutes 30% of Island County. This figure is incorrect. There are approximately 80,000 out of 134,000 acres zoned Rural in Island County or 60% of the entire county, including cities. It is then stated that 47% of the Reserve is zoned Rural. This statement fails to recognize what protections are afforded within that 47%. How much of that 47% is already owned by NPS? How much is protected under some form of conservation easement? How much is owned by Au Sable, The Nature Conservancy, Seattle Pacific University, Rhodendron Park and other owners that will not develop their land into 5 acre residential development? How much of that land has already been subdivided into plats, such as Sierra or San de Fuca? How much of that

land is already smaller than 10 acres, thereby making any downzoning action irrelevant? Or conversely, how much protection is truly offered by downzoning land in the Rural zone of the Reserve? How much of that land is encumbered by significant critical areas such as Crockett Lake and Peregos Lake. These questions are very relevant in addressing the next statement which concludes that 5 acre development would significantly alter the existing visual character. The alarming tone of this statement fails to recognize existing conditions, protections and parcelization.”

Response: Thank you for your comment. The statement that the Rural Zone constituted 30% of Island County was taken from David Nemen’s report, “An Analysis of Island County Zoning And Development Regulations in the Ebey’s Landing National Historical Reserve”. Thank you for the correction. The statement that 47 % of the land is designated Rural Zone within the Reserve was calculated by the NPS Pacific West Region-GIS. The questions and analysis you recommend to calculate all protected lands within the Reserve would be a time-consuming, but useful calculation. The General Management Plan is a general guide for the future management of the Reserve. Several implementing plans will build off of the GMP and provide the opportunities for more specific analysis as you suggest. The Land Protection Plan (LPP) for Ebey’s Landing NHR will be updated to reflect the current land protection needs of the Reserve. The level of detailed investigation suggested in your comments is appropriate for an LPP. Reserve staff will consult with county staff during the early stages of the LPP update, to assure that current trends and protective measures, such as critical areas designations, are adequately considered.

However, for the purposes of the GMP, the planning team based its conclusion that five acre lots are not sufficient to protect the scenic rural character of the Reserve on the planning information available at the time and by viewing existing, developed five acre zoning within and around the Reserve.

The planning team acknowledges that in recent years, additional measures have been taken by Island County to address some of these issues. Some of these changes have occurred since the initiation of the Reserve’s GMP planning process. These changes are summarized in the “Background of the Reserve” chapter under “Island County Zoning and Ordinances.”

Comments Question Land Protection Priorities in the Reserve

Comment 1: “When looking at Figure 9 one can see that there is only one existing 5 acre parcel within this view for a distance of just shy of 1 mile. Using this property as an example, one that is situated in a very visible location along the highway, appears to be sensationalizing this issue. A simple analysis of the zoning designations along the highway would show that there is very little ability to subdivide any significant amount of land into smaller parcels than already exist. The County is uncertain as to why none of the maps or figures depict existing parcelization. A more useful analysis would be to identify all of the Rural zoned parcels within the Reserve, that are in private ownership, that are not fully encumbered by critical areas, that are not currently protected by easements or ownership, and that can be further subdivided. Identification of these parcels that are “likely” or susceptible to subdivision would provide a realistic look at the actual threat of residential development on the Reserve. This information should then be used in the prioritizing process for land acquisition and purchase of conservation easements. The County also believes that it would be useful for groups such as The Nature Conservancy,

Whidbey-Camano Land Trust and other conservation minded organizations that seek to preserve land.”

Response: Figure 9 is a zoning map and does not show all of the several thousand parcels within the Reserve. In fact there are four 5-acre parcels on the 65 acre site chosen for this simulation and several 5-acre parcels in the vicinity of the site. The site was chosen as a hypothetical example of the effects of 5 acre development because it is owned by the National Park Service and not by a private owner. Existing examples of very similar 5-acre development, such as at the corner of Engle Road and Ft. Casey Road, were not used in order to not offend existing residents or property owners within the Reserve.

Comment 2: “The County also believes that if the Park Service desires to curtail future subdivision and residential development that it should identify lands that are most threatened and prioritize these properties for acquisition or purchase of conservation easements.”

Response: The Land Protection Plan for the Reserve will identify key lands that need protection through purchase of conservation easements. The National Park Service will continue to work to acquire needed interests in high priority lands on a willing buyer / willing seller basis.

Land Use Measures: Support County Regulatory Overlay Zone

Comment: “WEAN strongly supports inclusion of the proposal for Island County to adopt a regulatory overlay zone for the unincorporated portion of the Reserve. 3-128. Given recent and ongoing impacts to the Reserve from development this is clearly warranted.”

Response: Please see response to the comment below regarding opposition to the County Regulatory Overlay Zone.

Land Use Measures: Oppose County Regulatory Overlay Zone

Concern Statement: Comments oppose the overlay zone, expressing concern about the regulatory nature of adopting another overlay zone and question the compatibility of this land use measure with the purpose of the Reserve.

Representative Quote: “The County opposes development of a zoning overlay designation that includes downzoning, or any other regulatory burdens. The premise of the Historic Reserve was to create a public/private partnership with landowners. The Historic Reserve was not established as a regulatory agency. If the Park Service believes additional regulation is necessary then the federal government should pursue a different designation and authority of control. The County believes that a zoning overlay is contrary to the purpose of the Reserve in that it is a regulatory approach for protection. The County believes that its previous GMA actions along with the establishment of a Historic Advisory Committee that evaluates all new structures, subdivisions and other land use actions within the Reserve demonstrates a commitment to preserving the character of the Reserve. The Historic Advisory Committee operates within a defined geographic boundary that already represents an overlay with rules and regulations that apply to development. The County will not incorporate the GMP into the Comprehensive Plan if it includes this type of recommendation because it would create an inconsistency within our own policy framework.”

Response: All mention of an overlay zone has been removed from the Final GMP/EIS, with the hope that the county will continue to improve the existing Historic Preservation

District and use other planning tools, as it deems appropriate that will result in reasonable protection of the rural character of the Reserve.

The NPS has no land use regulatory authority related to private land within the Reserve. No zoning or land use controls will be enacted by the Town of Coupeville or Island County without the approval of the appropriate elected officials, either County Commissioners or Town Council, and after appropriate public review processes have been followed. Adoption of this General Management Plan by the Town or County does not change that fact.

Congress established the Reserve in 1978, as a unit of the National Park System, because of its outstanding historic and scenic value. Public Law 95-625 envisioned that the Reserve would be appreciated, visited, and enjoyed by a national constituency, and cared for by a partnership of local state and national government.

While the Reserve was created to be managed by a unit of local government (i.e. Trust Board), management still includes the responsibility for stewardship of this special place for the entire nation. Protecting the special character of Ebey's Landing NHR will require a balancing of interests and the cooperative efforts of all involved.

SOCIOECONOMICS

Comments Provide New or Corrected Information for Socioeconomics

Comment 1: "The EIS states that 30% of Island County is in the 5-acre Rural zone. 3-198. This is incorrect. Of the area within Island County's land use jurisdiction, the Rural zone is over 65% of this area."

Response: Thank you for your comments. The Island County-wide acreages for the Rural zoning designation will be corrected. The questions you pose in order to have a more detailed understanding of the potential for development at the 5 acre density will be helpful during further analysis. The General Management Plan is a general guide for the future of the Reserve. Several implementing plans will build off of the GMP and provide the opportunities for more specific analysis. The Land Protection Plan for Ebey's Landing NHR will be updated to reflect the current land protection needs of the Reserve. The level of detailed investigation suggested in your comments is appropriate for an LPP. Reserve staff will consult with county staff during the early stages of the LPP update, to assure that current trends and protective measures, such as critical areas designations, are adequately considered.

Comment 2: "Comment – Population [of Coupeville] is now estimated at 1785."

Response: Thank you for your response. The estimated population has been updated.

RECREATION

New or Corrected Information for Recreation

Comment 1: "Note that the current description of NPS owned trails in Volume 1, page 90 includes the Ridge Trail connecting the Prairie Wayside with the Bluff Trail. Assuming that the report is referring to the trail connecting the Prairie Overlook with the Bluff Trail (as pictured on page 98), this trail is on private land rather than NPS land."

Response: Thank you for your comment. The GMP has been revised to clarify the proper names and ownership of the trails noted in the text.

Comment 2: “Rhododendron Park is referred to as a “developed park.” 3-58. There are several service roads in the forest, the campground is without electrical power, and there are only vault privies. Campgrounds and parks in this condition are not usually classified as “developed.” This classification only makes sense if the Island County developed baseball play field is included as within Rhododendron Park. The local perception is that Rhododendron Park is the forested area where the understory is dominated by *Rhododendron macrophyllum*. not the much smaller area deforested by Island County. The EIS also incorrectly states the size of this forest patch as only 10 acres. It is considerably larger than the total of 44 acres reported.”

Response: Thank you for your comment. The reference to Rhododendron Park on page 56 of the GMP has been updated.

Comment 3: “*The Coupeville Town Council has recently passed a new comprehensive plan, which supports regulating personal watercrafts. The means of regulating this use will not be decided until April 2001. The compromise could possible be a speed limit within the Cove.*” Comment – the highlighted portion is not correct.”

Response: Thank you for your comment. The text on page 35 of the GMP has been corrected to note that there are currently no Town of Coupeville regulations pertaining to personal watercraft use in Penn Cove.

Comment 4: “The discussion of visitor use has contradictory information as to age of youngest visitor and appears to reverse percentages:
According to the report, the average age of the sampled visitors, which included no one younger than 16, was approximately 47 years. Ages ranged from 16 to 85 years.
The largest group of visitors was comprised of two people (36 percent) with the second largest group comprised of four people (21 percent). Almost half of the visitor groups came with children 15 years or younger.”

Response: Thank you for your comment. The GMP has been revised to clarify the visitor survey information.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

December 1, 2005

Reply To
Attn Of: ETPA-088

Ref: 00-023-NPS

Reserve Manager
Ebey's Landing National Historical Reserve
P.O. Box 774
Coupeville, WA 98239

Dear Sir or Madam:

The U.S. Environmental Protection Agency (EPA) has received the Draft Environmental Impact Statement (EIS) for the proposed **Ebey's Landing National Historical Reserve General Management Plan (GMP)** (CEQ No. 2005034) located on Whidbey Island in Washington State, for review in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. EPA's review of this EIS focuses on the potential for natural resources (e.g., air, water, wetlands) impacts from the proposed plan, and not on other elements of the alternatives, including Reserve management structure, visitor amenities, and plans for conservation easements.

The GMP applies to 17,572 acres comprising the Reserve. The Reserve is managed by a Trust Board oversight structure where the National Parks Service shares management with Washington State, Island County, and the Town of Coupeville as participants on the Board. The GMP is also incorporated into other comprehensive planning efforts of Washington State Parks, Island County and the Town of Coupeville for land within the Reserve.

With respect to natural resources, the Ebey's Landing EIS evaluates three alternatives (A, B, and C) for public use of Reserve resources over the next 15- 20 years. Alternative A, no action, maintains the current level of Reserve management and visitor amenities, which does not currently include a coordinated effort to monitor environmental indicators, like air and water quality, within the Reserve. Alternative B, the Preferred Alternative, includes proposals to increase both funding and coordination related to environmental monitoring of natural resources. Alternative C includes the same level of environmental monitoring as Alternative B, with different Reserve Management options for which EPA offers no opinion.

Lack of Objection

Based on our review and evaluation, we have assigned a rating of LO (Lack of Objection) because we did not identify any actions in the proposed General Management Plan that would have significant adverse impacts to the natural environment within the Reserve as defined in the GMP. EPA supports the additional funding and cooperative efforts that the Park Service has identified in the Preferred Alternative to increase stewardship of the natural resources. This rating, and a summary of our comments, will be published in the *Federal Register*.

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BY *pg* | DATE *12/1/05*

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Summarize Efforts for Natural Resources Stewardship

With only 684 acres of NPS-owned land and 2,023 acres of NPS conservation easements, the ability for the NPS to direct stewardship of the natural resources within the entire Reserve is limited. Alternatives B and C do, however, include elements to expand the role of the NPS in natural resource protection (p.iii). EPA supports this commitment to increased stewardship of natural resources via additional funding, collaboration, and monitoring activities. EPA believes that the GMP merits further clarification regarding these activities and contingencies for future monitoring of environmental indicators within the Reserve.

First, we recommend that the EIS include a better summary of those actions (e.g., via table or bulleted list) that will be pursued over the course of the 20-year life of the management plan related to stewardship of the natural resources. Second, we recommend that the EIS clarify whether periodic reporting on natural resources is planned. It is not clear whether any natural resource monitoring reporting is part of the annual appraisal of management and operation of the Reserve per PL 95-625(e) (EIS, p.99) or other reporting. EPA recommends that an action items (similar to p. 110) be added to the EIS Alternatives B and C for preparation of a natural resource monitoring plan summarizing the various efforts that will be pursued over the life of the GMP. More details related to our recommendation are provided enclosed.

Thank you for the opportunity to review this EIS. Should you have any questions, please contact Peter Contreras of my staff at (206) 553-6708.

Sincerely,



Christine B. Reichgott, Manager
NEPA Review Unit

Enclosures

Ebey's Landing GMP EPA Comments on Draft EIS

EPA supports the many important enhancements included in the proposed GMP. The GMP identifies various plans that will be generated to implement portions of the GMP. For example, a Land Protection Strategy Plan will be prepared to identify methods, funding and priorities for protecting significant properties within the Reserve (EIS, p.223). The EIS lists certain Action Items, including developing and updating various plans and cooperative agreements to implement the GMP objectives (EIS pp. 110 and 128).

EPA recommends that preparation of a Natural Resources Monitoring and Implementation Plan be included in this list of action items that would catalogue all of the opportunities identified in the GMP, which will be pursued over the life of the plan. Since many activities are subject to obtaining funding, reliant on other entities for implementation, or are otherwise uncertain, a natural resources implementation plan would be a useful tool to identify and track the many stewardship opportunities that will contribute to the health of the Reserve. The Trust Board or NPS may choose to provide periodic reports to the public on its efforts that could help focus uniquely on the Ebey's Landing Reserve.

By way of illustration, EPA lists many of the actions and opportunities that are mentioned in various places in the GMP, which EPA believes would be well-suited for including in the recommended Natural Resources Monitoring Plan.

Page 11 – the Purpose and Need indicates there are “major information gaps” on ESA-listed species, noxious weeds, aquifer recharge/drawdown, and threats to Penn Cove.

Page 35 – two permitted effluent discharges into Penn Cove. Have there been any exceedances of permit limits over the life of the permits?

Page 35 – Penn Cove is one of several Puget Sound marine areas monitored by Washington State Department of Ecology. Stratification and low dissolved oxygen concentrations have been documented per 1998 data reporting. Are there plans for Ecology to update this information during the life of the GMP?

Page 37 – tide gates to Crockett Lake in disrepair and potentially inhibiting natural water flow and fish passage, and that manipulation of lake levels have impacted certain ecosystem functions.

p.38 – saltwater intrusion from excessive ground water pumping in areas, and chloride levels exceed MCLs as a result.

pp. 42-48 – document the presence of invasive species and noxious weeds and decline of certain sensitive plant species like the golden paintbrush.

Page 102 – Appendix D, Vital Signs Workshop list is referenced, but it is not clear what the outcome (priorities and needs) were from that workshop. The EIS should include a summary of what the identified needs and priorities are, or otherwise provide further clarification for Appendix D.

Page 117 – Natural Resources – funding would be solicited for soils monitoring. Funding would be sought to address “important research topics such as sea spray influences, effects, of the pub plan in Port Townsend, tropospheric ozone and airborne toxics.

Page 117-118 – Water Resources. This section lists the following funding/collaboration intentions:

- Work in partnership to protect and restore wetlands
- Encourage protection of aquifer and surface waters & minimize pesticides and contamination runoff
- Encourage and seek funding for hydrologic assessments
- Funding for monitoring topics [not identified in the EIS] in the Ebey’s Landing National Historical Reserve Resources Management Plan for land and waters adjacent to Penn Cove. [Note: We could not find a date/citation in the bibliography for this document]
- Address monitoring issues such as state/federally listed plants
- -research uses on wetlands, hedgerows, golden paintbrush, fire management and other topics related to the health of the central Whidbey Island ecosystem.

Page 178, Air Resources – Staff would join existing air quality networks; seek funding to establish a monitoring program for the Reserve, address key monitoring questions

Page 179 Water Resources – references a description in Alternative B of a “comprehensive research and monitoring agenda”. Is this a reference to those items listed on pp. 117- 118?

Page 179, *ibid* – “Recommendations derived from research and monitoring of water resource issues would lead to a wide variety of potential projects that would be designed to maintain or improve aquifer recharge purity and improve surface water management and nearshore marine habitat.”

Page 180, *ibid* – “The active management of the manure lagoons and the former Engle Farms would have a beneficial effect on groundwater. The knowledge derived from extensive research and monitoring would have minor to moderate beneficial impacts on planning for riparian zone protection and enhancement, Crockett Lake/marsh restoration, and aquifer protection. Restoration of riparian corridors...”

Ibid – Working with farmers in the protection of aquifer to minimize contamination.

Ibid – “Creation of impoundments or riparian corridors...”

Pages 218 – Summary of Public Comments, Natural Resources. It is unclear from the document whether the bullet comment items listed will be implemented and what priority they will have if funding is unavailable to pursue all actions.

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

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Correspondence Information

Status: New **Park Correspondence Log:**
Date Sent: 12/01/2005 **Date Received:** 12/01/2005
Number of Signatures: 1 **Form Letter:** No
Contains Request(s): Yes **Type:** Web Form
Notes:

Correspondence Text

PART 1 of 2 COMMENT FORMS

General:

Thank you for the opportunity to comment on the EBLA Draft GMP and EIS, September 2005. WSDOT provides these comments to assist development of the GMP and encourage a constructive working relationship with the NPS on projects for SR 20 and SR 525 in the Reserve vicinity. Important to our working relationship is a mutual understanding of our missions. WSDOT is a service industry whose mission is to "keep people and business moving by operating and improving the state transportation systems vital to our taxpayers and communities." This mission differs from the NPS mission of park management and land protection. Transportation is a land use, which requires planning to promote safety and solutions responsive to development. The only way we can do our job better is in partnership with other government entities and the public.

Page 69 of the Affected Environment section acknowledges SR 20 and SR 525 as main commuter traffic routes, and page 89, Boundaries description, acknowledges these routes as primary access to the Reserve. Consider contacting the WSDOT Mt. Baker Area Planning Office Manager Todd Carlson, and Engineering Managers Marco Foster and Jay Drye, to explore how WSDOT can better work in partnership with the NPS and the Trust Board on the goals of the GMP. While I have no knowledge of whether WSDOT was invited to be a cooperating entity to the GMP EIS, only our Heritage Corridors office is listed on page 231. Additionally, WSDOT is not listed on the circulation list for this document.

Generally, we want to emphasize that any development in the area needs to consider collecting developer fees to address traffic impacts. WSDOT requests the right to be involved in the traffic mitigation development process.

The reader-friendly format of this well-illustrated document is a fine product and example, as WSDOT works toward making our NEPA documentation more accessible to the public.

Please see Part 2 of 2 for specific comments.

Author Information

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Date Sent: 12/01/2005	Date Received: 12/01/2005
Number of Signatures: 1	Form Letter: No
Contains Request(s): Yes	Type: Web Form
Notes:	

Correspondence Text

PART 2 of 2 COMMENT FORMS -- See part 1 of 2 for general comments.

Specific:

p. 5, WSDOT Improvements – This section only speaks of WSF projects, yet other areas of the document discuss future highway projects as having potentially substantial effects upon the Reserve. Broaden the description scope of WSDOT improvement projects.

p. 5, Washington State GMA – The GMA also provides means for local comprehensive plans through the transportation element to coordinate with WSDOT on transportation planning and improvement projects. Emphasize more ways the GMA can facilitate the purpose and significance of the Reserve.

p. 7, Desired Future Conditions, bullet 8 – We affirm, as a government partner, WSDOT can assist with visitor safety through our transportation improvement projects.

p.11, Land Protection – This section acknowledges the Trust Boards reliance upon “local government applicable and ordinance, as well as landowner cooperation” to protect the rural character of the Reserve landscape. As a landowner and state government department, WSDOT affirms interest in a cooperative work relationship with the Trust Board and the NPS.

p. 70, Highway Level of Service Standards – The transportation projects described are safety improvement projects in response to a substantial number accidents, which defines those sections of SR 20 as High Accident Corridors. The projects are not related to LOS improvement. Remove the project descriptions from the discussion of LOS.

pgs. 107,144, & 153, Transportation, Access, and Circulation– WSDOT affirms an on-going staff level work relationship with NPS and Reserve staff, posed in all alternatives, is important towards a

cooperative protection of Reserve resources and transportation safety for commuters and visitors.

p. 129 & Fig. 15, South Gateway – An open working relationship with WSDOT for development projects involving WSDOT right of way, would assist both GMP EIS goals and WSDOT's mission.

p. 157, WSDOT SR 20 Realignment – WSDOT affirms the benefits of mutual understanding of agency mission and project impetus by establishing a better work relationship with NPS. The subject project is a response to high accidents in that corridor of SR 20 based upon existing traffic data and roadway design standards. Traffic science shows the arbitrary low speeds on a road designed for higher speeds, creates more stop conditions, which are unsafe and cause more severe injury type accidents than when operation speed is set within a 5-mph range of the road's design speed. In brief, higher speed conditions influence safer traffic. Realignment can improve sight distance and driver comfort through easier to maneuver curves, without increasing road speed. We can work with the NPS towards safer road conditions that "are in harmony with the purpose of the Reserve."

p. 159, Mitigation Measures – Add a proactive measure to work with WSDOT to understand transportation planning implications of regional development to the Reserve.

p. 172, Cumulative Impacts – WSDOT does not regulate traffic. State transportation standards are based upon USDOT and AASHTO regulations. Please correct and contact the Mt. Baker Planning Office for an informed understanding of how WSDOT works with regional transportation.

p. 203, Effects on Transportation Access, and Circulation, Methodology and Assumptions – The planned improvement projects for SR 20 at the Reserve would not increase traffic because they are not capacity or mobility projects. These safety improvement projects, are unfortunately, reactive to an existing traffic issue. WSDOT seeks to be proactive with transportation planning, however, in reality our projects are often a response to an existing need.

p. 203, Impacts from Alternative A, Analysis – We agree, coordination between WSDOT, the Reserve staff, and Island County "would have a positive long-term effect."

December 1, 2005

To the Trustees of the Ebey's Landing National Historic Reserve:
Regarding: Comments on Draft Management Plan
From: The Washington Sustainable Food and Farming Network

The mission of the Washington Sustainable Food & Farming Network is "To promote community, environmental, social and economic well-being by joining together and mobilizing residents and organizations of Washington in creating a sustainable food and farming system." **The Washington Sustainable Food & Farming Network** (The Network) was formed in 1997 by individuals and organizations that identified a need for a unified, statewide voice to press for state programs and policies that promote and support sustainable agriculture and small farms. The Network's diversity of constituency, its statewide scope and its policy/advocacy focus make the organization unique in Washington, and one of the strongest statewide alliances for sustainable agriculture in the Northwest.

The General Management Plan & EIS Alternative B and Alternative C, which includes more interpretive opportunities, are both Alternatives that we support. The dramatic rise in the number of new structures and roads and the addition of subdivisions is alarming and not in keeping with the general mission of the Reserve. The findings in the Summary section are consistent with national trends throughout the country and in Washington, in particular.

Over 23,000 acres of farmland are converted each year in this state – equivalent in size to Lake Washington. According to American Farmland Trust, "based on the quality of the soil and the rate of development, the Columbia River basin is the country's 16th most threatened region in farmland loss Puget Sound ranks 5th." Modern possibilities for long-distance commuting, a growing and wealthy retirement community, and a rising demand for recreational second homes is causing this problem to reach beyond cities into what used to be rural, agricultural areas. The impact of this is to further fragment land uses and to make it increasingly difficult for farmers and ranchers to do business. Without intervention, the pattern of urbanization so clearly articulated in the GMP/EIS will continue in the Reserve. Control strategies that include zoning, such as an Agricultural Protection and Overlay district, purchase of conservation easements and other mechanisms that support and stimulate farming would make significant progress in protecting the fertile resources we have in the Reserve.

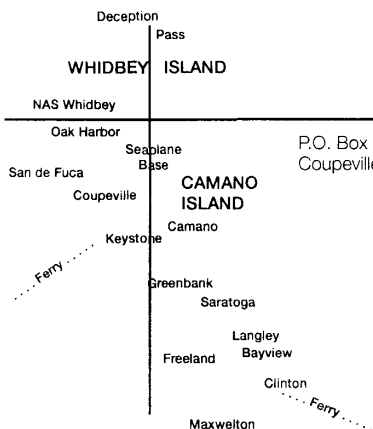
Rural communities in Washington were established around natural resources-based activities such as agriculture, ranching, fishing, and timber. Agriculture plays a critical role in determining the health and vitality of our communities in Washington State. Agriculture certainly has played a critical role in the history of Island County and Coupeville. As stated in your Summary, the loss of the agricultural community will be significant in altering the character and human relationship to the cultural landscape, and may undermine the purpose for which the Reserve was created.

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Sustainable agriculture, enacted through policies and programs that encourage good stewardship practices and a closer connection between producers and consumers, is a new vision for the future that we can provide for ourselves and for those who follow us. The Agricultural Incubation Center, soon to be located in Mount Vernon, is a new collaboration between Island County and several other countries. It is an example of new interest in practical approaches to assist small farms and farmers to become sustainable and viable, and has been incubated by state funds. Sustainable projects are also taking place throughout the country. In Los Angeles, for example, billions of dollars are being invested by the city to install water catchment and filtration systems under schools to reduce the city's draw on the Los Angeles watershed and Columbia River basin. Water treatment facilities, like the one in Burlington, VT are being developed that purify water and produce greenhouse plants and fish as value-added products. Dead ponds like those in Harwich, MA, polluted by chemicals, have been 'healed' by using natural biological systems. Ebey's Reserve could become an Interpretive Center for some of the "Best Sustainable Practices" for food and farming in Washington. Much work in biologically intensive agriculture is already already being done by WSU Extension Offices throughout the state and by the WSU Center for Sustaining Agriculture and Natural Resources. Potential partners would provide new opportunities for economically successful farming in the Reserve and throughout the country, and perhaps the state.

Ecologically designed systems have been shown to treat not only sewage but seepage. An Ecologically designed system is a living system of plants and animals that break down pollutants as part of their natural life cycle. Our manure lagoons and critical areas ordinances, water-treatment facilities, polluted salmon streams all could benefit from ecologically designed systems. With a little engineering and astute application, we know that these systems can help us undo the damage done to our surface and groundwater's in Washington. This has profound implications for sustainable water use for agricultural producers of all sizes here in Washington State. Natural systems are incomparable recyclers. The costs of any living technology are generally equivalent to standard treatment, and have no need for expensive and dangerous chemicals. Natural systems have the ability to self-organize and self-repair, and reduce costs over time.

In Alternative C, Interpretive Centers are recommended. There is a great deal that could be done in the Reserve to promote it's mission by creating 'demonstration farms' or public interpretive centers that show new solutions to farming challenges. There is a great need for this in our state. The Reserve not only has the land required but currently has barns and other buildings that would make this possible. The Intervale Foundation, located in Vermont, has a similar mission to the Reserve. The local community has become very 'invested' in projects at Intervale from composting to it's Farm Mentor Program, where 25 new farmers are mentored by farmers who have already been through the program. They use Intervale lands and the new farmers rent the Intervale land for the 3 years they are in the program. I am certain there are other models to observe that could be applied in the Reserve that would 'fit' the mission. Interpretive Centers offer so many possibilities to bring the past and its relevance forward while providing opportunities to educate people about the importance of farmlands and it's relationship to our communities. In addition, these lands in the Reserve can help provide future food security



Island County Board of Commissioners

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November 30, 2005

Ebey's Landing National Historical Reserve
Attn: Rob Harbour
P.O. Box 774
Coupeville, WA 98239

RE: Comments on the draft General Management Plan and Environmental Impact Statement for Ebey's Landing National Historical Reserve (GMP/EIS)

Mr. Harbour,

Island County thanks you for the opportunity to comment on the draft GMP/EIS. We understand and appreciate the laborious effort that these documents represent and recognize the importance that effective planning will have in protecting such an asset to our community. We make this statement because we are well aware that when feedback is provided it generally focuses on the negative or inadequate aspects of such a product.

There is much good in the draft GMP/EIS, however, Island County would like the following comments be considered as the Historical Reserve moves forward with this endeavor.

Volume I: Draft General Management Plan and Environmental Impact Statement

Alternative B – The GMP/EIS indicates that Alternative B is the preferred alternative. Island County encourages the Park Service to continue working with property owners within the Reserve for the purposes of acquiring conservation easements and brokering land arrangements with farmers so that land is protected and allowed to continue in active farming use. Agriculture is a critical element of preserving rural character and of Central Whidbey in general. Agriculture should be fostered in ways that allow existing operations as much flexibility as possible to continue farming, including the ability to change their operation as technology and economic conditions change. More specific comment is provided later regarding the development of a zoning overlay within the Reserve, however the County is generally opposed to this concept. Approximately 30% of the Reserve is already zoned either Commercial Agriculture, Rural Agriculture or

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BY *RG* DATE *12/1/05*

Rural Forest. These zoning designations were based on ownership of land, acreage, presence of prime agricultural soils and enrollment in agricultural tax programs. 11% of the remaining area is already characterized by residential development due to platting patterns of pre-GMA development, e.g. Rolling Hills, Crockett Lakes Estates, Glencairn, Penn Cove Park, Snakelum Point, Rhodena Beach, etc. or within the Town of Coupeville. Still more land is characterized by grandfathered residential platting that remains within the Rural zoning designation that cannot be undone, e.g. San de Fuca, Sierra, Long Point Manor, Kineth Point. An additional 10% of the land area has already been preserved by state and county acquisition, e.g. Kettles, Fort Casey, etc. Still other lands are owned and operated by quasi-public or non-profit organizations who are preservation minded, e.g. Seattle Pacific University's Camp Casey Conference Center, Whidbey Camano Land Trust, The Nature Conservancy and the Au Sable Institute. The remaining land is zoned Rural with a 5 acre minimum lot size. Upon review of the GMP/EIS it appears as though this overlay would be aimed at regulating these parcels. The County believes there are other mechanisms for pursuing protection of these lands.

Summary – Page i – In the second paragraph of this section it states that the current GMP is 25 years old and that agriculture is on the decline while a conversion to residential uses are on the rise. The life of the current GMP is not consistent with the current county land use requirements. Substantial downzoning actions were taken by the Board of Island County Commissioners in 1998 which changed the residential zone from 3.5 dwelling units per acre to 1 dwelling unit per 5 acres. There was a substantial area of the Reserve that experienced this change. This action had a tremendous impact on landowners affected by this zoning change (a person with a 5 acre lot was allowed to have 17.5 houses and is now only allowed 1). Less than 1% of the land area within the Reserve can be subdivided to a lot size of less than 5 acres. The attached map shows where building permit have been issued within the Reserve. It is clear that the vast majority of building permits issued during this timeframe (a timeframe which represents the current land use policies) are located within pre-existing subdivisions. The clusters of dots shown on the map are located in Rolling Hills/Glencairn, Sierra, Crockett Lake Estates, Long Point Manor, Penn Cove Park and San de Fuca. The clear pattern of development within the Reserve is infill of existing lots. Of the remaining building permits issued within the Reserve, almost all are located on parcels that were created long before the current zoning framework was adopted. Furthermore, during the same period of time the county has processed subdivision applications which have yielded 275 new lots – countywide. And the vast majority of those newly created lots are located outside of the Historic Reserve. It is the County's position that conversion of agricultural land to residential uses within the Reserve has been drastically curbed by actions taken in 1998. Conversion from agricultural land to residential land occurs for a myriad of reasons. Further downzoning of land in the Reserve will not result in preservation of agriculture.

The last paragraph indicates that the Trust Board will be recommending the adoption of the approved final GMP by the elected officials of Island County as a component of their Comprehensive Plan. The County opposes development of a zoning overlay designation that includes downzoning, or any other regulatory burdens. The premise of the Historic Reserve was to create a public/private partnership with landowners. The Historic Reserve was not established as a regulatory agency. If the Park Service believes additional regulation is necessary then the federal government should pursue a different

designation and authority of control. The County believes that a zoning overlay is contrary to the purpose of the Reserve in that it is a regulatory approach for protection. The County believes that its previous GMA actions along with the establishment of a Historic Advisory Committee that evaluates all new structures, subdivisions and other land use actions within the Reserve demonstrates a commitment to preserving the character of the Reserve. The Historic Advisory Committee operates within a defined geographic boundary that already represents an overlay with rules and regulations that apply to development. The County will not incorporate the GMP into the Comprehensive Plan if it includes this type of recommendation because it would create an inconsistency within our own policy framework.

Island County Zoning and Ordinances – Page 4 – The second paragraph recommends that a demolish ordinance be adopted by Island County in order to reduce occurrences where historic structures are removed from property. In 2004 Island County reviewed and updated the Historic Advisory Committee rules and regulations as part of the Annual Comprehensive Plan review process. As a result of this public process Island County included provisions regarding demolition of historic structures. The revised rules also greatly clarify the goals, objectives and role of the Historic Advisory Committee in their capacity of reviewing subdivisions, design of structures, placement of structures, etc. all of which further enhance the manner in which development will occur within the Reserve.

As stated in paragraph #1 the 1980 GMP recommended that the County adopt five acre zoning within the Reserve. The County adopted the Reserve's comprehensive plan in 1998 and accepted the recommendation that five acre zoning be adopted. The Reserve had the opportunity in 1998 to make additional recommendations. Given the drastic level of downzoning that occurred in 1998 and the fact that the County's zoning densities are compliant with the GMA, the County is unwilling to revisit zoning densities.

Grasser's Hill – Page 41 – In the discussion of the *Iris missouriensis* population located on Grasser's Hill it is worth noting that a conservation management plan has been prepared and is now being implemented with cooperation from all of the property owners. In exchange, the property owners have all been enrolled in the Public Benefit Rating System tax program which provides each owner with a property tax reduction for their cooperation and effort.

Agricultural Resources – Page 49 – Paragraph 2 states that the loss of farm land "is due in large part to strong residential development pressure." The County questions the certainty in which this conclusion is made. As stated in the last sentence it is increasingly difficult for farmers to make a profit on agricultural land. The County has received testimony from the agricultural community who consistently states that they opt to sell their land because agriculture is no longer profitable. Testimonial accounts have not revealed that residential development is a pressure that forces farmers in to abandoning their lifestyle and selling their land for residential development. The County feels that it is irresponsible and inaccurate to make this statement for two primary reasons. First, agricultural operators are eligible for deferred tax programs that drastically reduce their tax burden. In other words, agricultural operators are not being taxed off of their land which is the traditional reason behind development pressures being a cause for the loss of agricultural land. Second, the County adopted a right to farm ordinance in 1998 which

requires that all land that is within 500 feet of an agricultural activity be subject to disclosure statements that are placed on property title which inform prospective buyers that there are nuisances associated with farming and that the County will not recognize complaints pertaining to normal agricultural activities. Farmers have consistently stated they have not desired being squeezed out of the farming industry and that it is due to the lack of profitability, and costs/loss of land due to ever increasing land use regulations. If farming were more economically viable it would not matter what the underlying zoning designation is. This is demonstrated by the fact that the residential zoning designation existed within the Reserve for 32 years and which allowed between 6 and 3.5 dwelling units per acre. Despite this fact, there is still a substantial amount of that land that continued in an agricultural use.

Resource Industries – Agriculture – Page 73 – Last paragraph of the page; same comment as above.

Population Trends – Page 77 – When discussing population trends in Island County it is worth noting that since 1998 the majority of growth has been in the form of infill development located within existing subdivisions created long before the GMA and/or the designation of Ebey's Landing National Historic Reserve. It is also worth pointing out that population growth has exceeded state averages but has been concentrated primarily in South Whidbey and Camano Island, and within Rural Areas of Intensive Development (RAIDs). This is important given that the statements in the GMP/EIS lead the reader to believe that Central Whidbey and/or the Reserve are experiencing this same rapid rate of growth when, in fact, they are not.

Island County Comprehensive Plan and Zoning Code – Page 84 – In the paragraph describing WEAN's appeal of the County's 5 acre zone it is worth noting that beside being upheld by the Growth Board, it was also upheld by Superior Court and the Court of Appeals. WEAN then appealed the Court of Appeal's decision to the Supreme Court who declined to accept their argument.

Related national Park Service Plans and Studies – Page 86 – First, second, fourth, and fifth bulleted item in second column. These are conclusions for development between 1983 and 2000. In December of 1998 the zoning densities and land use regulations substantially changed. The findings in these bullets are based on a prior set of land use regulations and should be dismissed as a basis that show trends into the future which are used in the development of any recommendation in the GMP/EIS. The numbers provided for this period do not characterize how development will continue beyond 1998.

The second bullet states that the addition of new subdivisions has had one of the largest effects upon the landscape. The current zoning provisions virtually preclude future subdivision of land into lots smaller than 5 acres.

The third bullet states that fourteen structures were lost despite NPS and Trust Board efforts to convey the value of these structures. It is unclear from this comment who NPS and the Trust Board were attempting to convey this message to, but the County has since adopted an ordinance which requires a 30 day delay in approving the demolition of a historic structure so that NPS and other interested parties may be notified. Outside of the Reserve there is no delay in issuing demolition permits.

The fifth bullet addresses the impact of subdivision in open areas. The recently adopted 2004 ordinance requires subdivision applications to go through the Historic Advisory Committee so that the visual impacts may be evaluated. As a result of their review recommendations can be made regarding placement of homes and other structures, location of roads with respect to topography and hedgerows and other measures that preserve the overall appearance of the Reserve. These are amendments that have already been adopted.

Page 87 – First paragraph after the bullets. It is stated that urbanization, suburbanization, and residential pressures on the landscape “are” substantial and without intervention will continue. The analysis was based on a prior framework of land use regulation which has changed substantially. The County is uncertain as to the validity of the next statement which says that recent zoning changes in Island County are less restrictive than when the Reserve was created which may accelerate the loss of the Reserve’s rural landscape. This statement is erroneous. With very limited exception, the County’s land use policies have become more restrictive. The continued reference to the expansion of residential use of lands is not substantiated. Farms have been lost but there is no evidence to suggest that it is an encroaching residential landscape that is causing this. If farming isn’t profitable it is certain that other land uses will prevail. The County is not convinced that its land use policies have led to the conversion of agricultural land to residential uses as is suggested throughout this GMP and EIS.

Prime and Unique Soils – Page 103 – Island County already restricts the ability to erect structures in areas where prime and unique soils are present.

Land Protection Methods – Page 108 – In the third paragraph it is stated that the Rural Zone constitutes 30% of Island County. This figure is incorrect. There are approximately 80,000 out of 134,000 acres zoned Rural in Island County or 60% of the entire county, including cities. It is then stated that 47% of the Reserve is zoned Rural. This statement fails to recognize what protections are afforded within that 47%. How much of that 47% is already owned by NPS? How much is protected under some form of conservation easement? How much is owned by Au Sable, The Nature Conservancy, Seattle Pacific University, Rhodendrum Park and other owners that will not develop their land into 5 acre residential development? How much of that land has already been subdivided into plats, such as Sierra or San de Fuca? How much of that land is already smaller than 10 acres, thereby making any downzoning action irrelevant? Or conversely, how much protection is truly offered by downzoning land in the Rural zone of the Reserve? How much of that land is encumbered by significant critical areas such as Crockett Lake and Paregos Lake. These questions are very relevant in addressing the next statement which concludes that 5 acre development would significantly alter the existing visual character. The alarming tone of this statement fails to recognize existing conditions, protections and parcelization.

Build Out Scenario – Figure 12 – Page 108 – The scenarios depicted in this image show a before and after look at 5 acre development. The picture is taken from the side of Highway 20 looking east and south. The rendition of this photo in this location of the Reserve is incredibly misleading. As the caption to the photo states the land is owned and protected by the NPS so this type of development could never occur. Additionally, this land is zoned Rural Agriculture and Commercial Agriculture with only one small

portion zoned Rural. Figure 12 shows the location of where the picture was taken from. When looking at Figure 9 one can see that there is only one existing 5 acre parcel within this view for a distance of just shy of 1 mile. Using this property as an example, one that is situated in a very visible location along the highway, appears to be sensationalizing this issue. A simple analysis of the zoning designations along the highway would show that there is very little ability to subdivide any significant amount of land into smaller parcels than already exist. The County is uncertain as to why none of the maps or figures depict existing parcelization. A more useful analysis would be to identify all of the Rural zoned parcels within the Reserve, that are in private ownership, that are not fully encumbered by critical areas, that are not currently protected by easements or ownership, and that can be further subdivided. Identification of these parcels that are “likely” or susceptible to subdivision would provide a realistic look at the actual threat of residential development on the Reserve. This information should then be used in the prioritizing process for land acquisition and purchase of conservation easements. The County also believes that it would be useful for groups such as The Nature Conservancy, Whidbey-Camano Land Trust and other conservation minded organizations that seek to preserve land.

Historic Buildings and Structures – Page 116 – The first paragraph of this section declares a desire to strengthen design guidelines. Has the Reserve evaluated those regulations that were updated in 2004 through a public process? Did the Reserve comment on that proposal and did the county fail to incorporate those comments?

Scenic Resource Management – Page 120 – The second paragraph indicates a need to develop a handbook that would provide voluntary building design ideas on how new structures can best be sited on property, how to select building materials and how to select colors. This comment fails to recognize the achievements of the Historic Advisory Committee and the assistance they have provided Island County. It also fails to recognize the recent update of those regulations and why they are inadequate.

Reserve Boundary – Page 125 – Prior to amending the Reserve Boundary, Island County recommends that the owners of the described lands provide consent to their inclusion. It is likely that if the Reserve boundary is expanded that there will be a subsequent request to amend the Historic Advisory Committee (HAC) boundary so that the two are consistent. Landowners who are part of this expansion should be aware of not only the implications of being included in the Reserve, but also those associated with being located within the HAC boundary. Until there is universal agreement by all affected landowners the County opposes the expansion.

Conclusion – Page 165 – It is Island County’s position that the conclusions presented for Alternative B are based on trends and analysis that were fostered as a result of prior development regulations. It is misleading to conclude that trends from 1983 to 2000 will continue under the current framework of regulation adopted in late 1998 which included substantial downzoning and the establishment of a right to farm ordinance. Additionally, since 1998 Island County has improved its shoreline regulations, its signs and lighting regulations, its historic advisory committee regulations, its cell tower regulations, as well as a myriad of other land use controls. The adoption of the 1998 comprehensive plan, development regulations and the subsequent amendments brought about substantial change in land use policy. It is improper to assume that the trends established under previous land use schemes will continue.

Overall Comments:

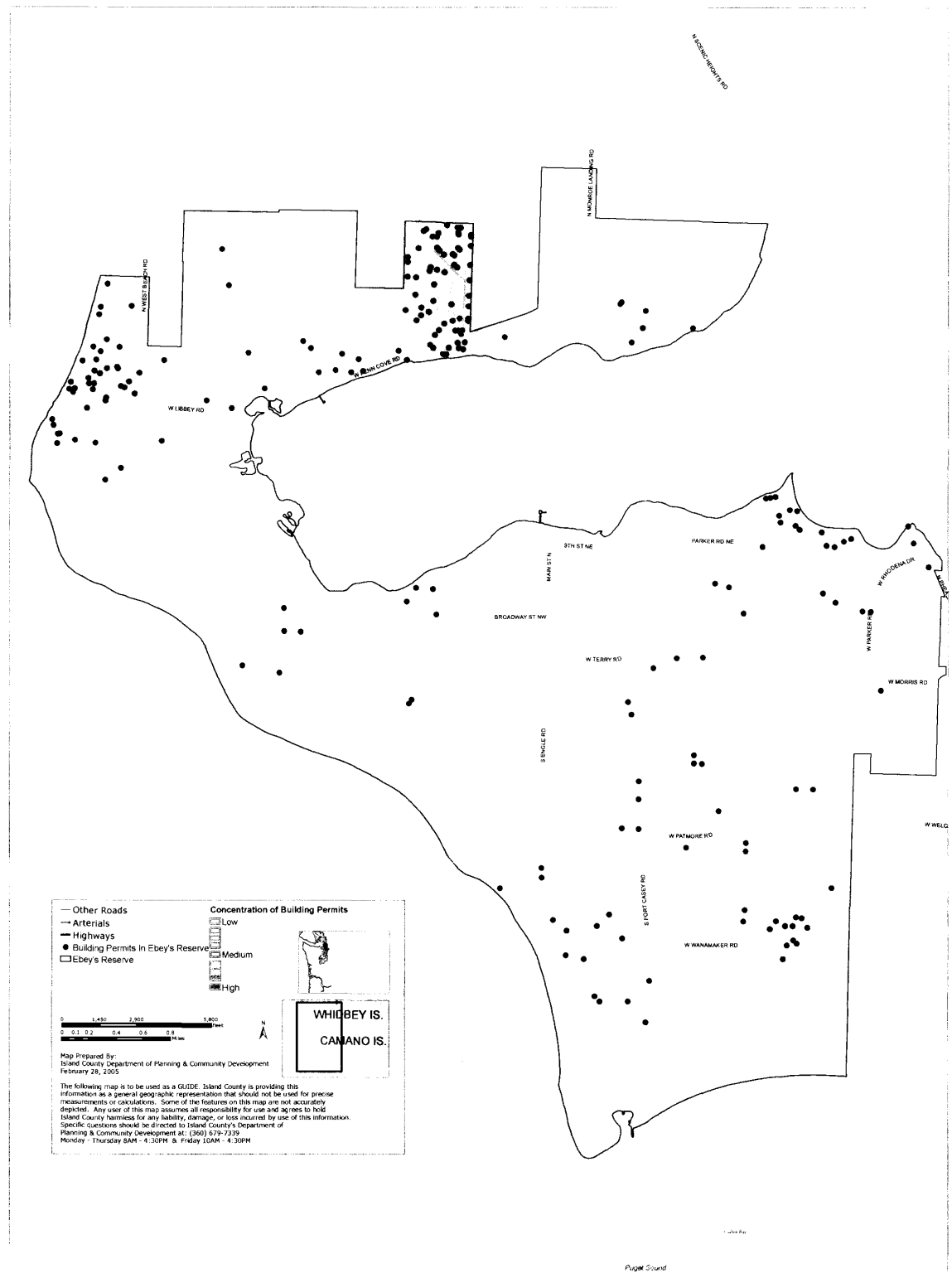
1. The draft GMP/EIS fails to recognize the achievements of the Historic Advisory Committee and the work that they done. The HAC effectively administers an overlay designation where landowners are subjected to a different set of requirements than anyone else in the County. The HAC's role is limited to making recommendations to the County, but the vast majority of those recommendations are incorporated into the permit approval making their input vital, useful and effective.
2. The draft GMP/EIS fails to recognize the significant changes in land use regulation adopted between 1998 and the present and instead relies upon trends that were established under prior regulations. The County believes that it is misleading to assume that prior trends will continue given that the framework for land use regulation has changed so significantly since 1998.
3. The County believes that if the Park Service seeks to implement more extensive and restrictive land use regulations within the Reserve that it should reconsider its own role and authority.
4. The County also believes that if the Park Service desires to curtail future subdivision and residential development that it should identify lands that are most threatened and prioritize these properties for acquisition or purchase of conservation easements.
5. The County believes that when the Park Service acquires a conservation easement that density and development restrictions should be incorporated directly into that agreement so that the property owner is adequately compensated for any loss in value of property.
6. The County believes that the Park Service should consider allocating adequate budget for purchase of land and conservation easements under current zoning standards rather than rely upon the County to implement rules and regulations that devalue land.

Please take the aforementioned comments into consideration in the continued development of the GMP/EIS.

Sincerely,

Mike Shelton
Chairman, Island County Board of Commissioners

MS:jt/ee





Trust Board of Ebey's Landing NHR
PO Box 774
Coupeville, WA 98239

Dear Trust Board,

Thank you for the opportunity to comment on your Ebey's Landing National Historical Reserve Draft General Management Plan and Environmental Impact Statement. I have waited till the last minute and that does not afford the best response. I apologize in advance.

There are several aspects of the plan I feel compelled to address: the viability of farming, private lands versus public ownership of lands, and the concept of a marine education center.

Let me begin with the marine education center since that is an area we have been engaged in for the last fifteen years, in a substantial way. Through a program I developed back in 1989 called WSU Beach Watchers we have been able to accomplish a great number of things in our community. I won't go into all we have done but want to focus on just a couple that relate to your efforts.

The first is the re-opening of the Admiralty Head Lighthouse in collaboration with the Reserve back in 1993 and to continue and expand interpretation there. Such historic structures provide the perfect intersection to pass along our cultural and environmental heritage. The other fine example of such an intersection is the collaborative relationship we developed with the Port of Coupeville, also in the early 90's, that has allowed us to do education at the historic Coupeville Wharf.

For a number of years we have had a permanent gray whale exhibit there and had just negotiated with the Port and expansion of the interpretive exhibit when your plan was released. Presently we are designing and installing an underwater camera system and several other exhibits about the marine life in Penn Cove. Your plan that seeks to add this type of a component to the Reserve's educational effort compliments what we are presently doing and could easily make for a fine partnership that blends community involvement, a university program and the Reserve providing a far more significant wonderful resource for our community. I encourage you to place this project into a higher priority since the elements of success are all present and ready to implement.

Now let me address agriculture and the issues of ownership. I have been engaged in supporting agriculture for 23 years now here in Coupeville as director of the Washington State University Extension program. Through all those years I have watched this

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BY *pg* DATE *12/1/05*

industry struggle and most die. Sometimes the death of a farm has to do with factors that have little to do with money, but mostly I think farms die because they are unable to support those who farm the land.

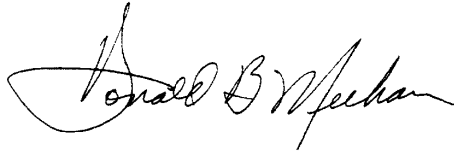
I think it is idealistic to think that zoning and land preservation can save farming without regard to the economic changes such activities impose. So how does that relate to your plan? Presently the reserve is a landowner, but it does not need to make a profit to feed its family. All of the other owners of land in the reserve have to feed families in order to keep managing the land they own. Such motivation drives people to want to put the land to best use and manage it for the greatest economic benefit. It is my opinion that lands should be returned to the private sector since it is that sector which will create and maintain the cultural heritage the Reserve seeks to preserve.

The Farm 1 and Farm 2 properties could be a big help to local agriculture if they play a role in future economic development initiatives to provide value added opportunities to local growers. I encourage the Reserve to carefully consider the possibilities of the Farm properties during discussions about their ultimate disposition. At a minimum, I encourage you to place the Farms back into private hands to carry on their long farming tradition.

I also hold that government programs (Reserve included), should seek ways to foster the economic health in the farming community, not weaken it. To that end each action proposed should be evaluated on its economic impact to farm families since their success will mean the success of maintaining our cultural farming heritage.

Thanks for the chance to provide some input.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Meehan". The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail.

Don Meehan
Director
Washington State University Extension Island County
P.O. Box 5000
Coupeville, WA 98239
Meehan@wsu.edu

Comment to Ebey's Landing National Historical Reserve General Management Plan
from the Central Whidbey Island Historical Preservation Review Committee (HRC)

The HRC should become regulatory. According to the EIS the largest impact is from new residential construction, the best way to have any influence on what that looks like is through the HRC.

We need more monies for land conservation within the reserve. The Trust Board must be more proactive in seeking money for conservation within the Reserve. Conservation Futures must be again used in the Reserve

EDUCATE all property owners in the Reserve about the significance of the Reserve. Invite property owners to celebrate the Reserve and make it relevant to them.

The County staff needs better education/training about the significance of the Reserve so they can pass this information on to the public, which they greet every day. Training sessions as well as publications and brochures would be of assistance to the staff.

Realtors in the reserve need annual training by the trust board on the significance of the reserve and how it benefits all.

Support and allow for creative adaptive use of Historic buildings. The Park Service should be encouraged to supply professional assistance in the area of historic preservation to property owners.

NPS owned buildings at the former Reuble Farmstead (farm 2) should be used as a possible preservation center to assist in providing training opportunities in building repair/preservation techniques but the farm land should go back into the private sector. If necessary or appropriate, lease the barn or other buildings out if it would assist the new property owner in his/her operations.

The NPS & Trust Board should promote creative & innovative forms of agriculture to perpetuate agriculture use of the land.

Institute an annual meeting to review the state/health of the Reserve that brings all the partners together at one time for sharing of concerns and education. The meeting would include the National Park Service, the Trust Board, the Town of Coupeville Mayor, Town Planning Director, Town Design Review Board, Island County Commissioner, County Planning Director, County Planning Commission and HRC.

Celebrate the Native American's connection to the Reserve. Involve all the tribes who used this land. The Trust Board would be the host.

Annual community celebration of ELNHR, held at a barn, Fort Casey or other appropriate venue.

Encourage the use of trails to connect public lands and create a Reserve wide trail system. Create upland and beach trails.

Establish marine trail in Penn Cove.

Whidbey Environmental Action Network
Restoration Education Preservation

Box 53, Langley, WA USA 98260
Fax: (360) 579-4080 Phone: (360) 579-4202 e-mail: wean@whidbey.net

*Dedicated to the preservation and restoration of the native biological diversity
of Whidbey Island and the Pacific Northwest*

Nov. 30, 2005

TO: Rob Harbor, Reserve Manager, Ebey's Landing National Historic Reserve
FROM: Steve Erickson
RE: Draft General Management Plan and EIS

Whidbey Environmental Action Network is a nonprofit group of over 400 member households. These are our comments on the Draft General Management Plan and EIS for Ebey's Landing National Historic Reserve. We look forward to working with the NPS and Reserve on implementing the GMP.

We support alternative B with some modifications. The most important of these involve including more of Smith Prairie in the proposed enlargement of the Reserve and inclusion of a feasibility study of the marine waters in the northern Puget Sound and southern Georgia Strait, as well as all waters abutting the Reserve, for possible designation as a National Marine Sanctuary managed by the National Marine Fisheries Service. We address these and other issues in our comments below. References to the EIS are shown as (e.g.) 3-40. The first digit ("3") refers to the chapter number in the digital version (pdf file). The second number refers to the page in that chapter.

Comments related to actions.

1. National Marine Sanctuary study and designation.

The health of the adjoining waters of Puget Sound is integral to the health and integrity of Ebey's Landing National Historic Reserve. Since a National Marine Sanctuary was first proposed about a decade ago the health of these waters has been in continual decline, resulting in depressed and decreasing fish stocks, declining water quality, and (now) recognized endangerment of the resident Orca population and subsequent listing pursuant to the Endangered Species Act. This is a regional issue, not peculiar to only the marine waters adjacent to the Reserve. We urge the NPS to request a feasibility study that encompasses the entire northern Puget Sound, Southern Georgia Straits, and Penn Cove for possible designation as National Marine Sanctuary managed by the National Marine Fisheries Service.

The DEIS suggests that protection can be achieved by continuing reliance on the agencies that have so far failed to arrest and reverse deterioration. See, e.g EIS 3-126. Unfortunately, this panoply of agencies have not shown themselves up to this task.

The Marine Resources Committee has absolutely no regulatory authority (3-108, 126, 137, 144-5).¹ In fact, the statutory authorization for this agency was to make recommendations for aquatic

¹ According to its website:

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reserves. After seven years and considerable expenditures, the Island County MRC has yet to perform this mandated task. We do not believe that this task is currently even on the MRC's agenda or workplan. While the educational work the MRC perform is valuable, it is not a substitute for the coordinated action needed to reverse the ongoing degradation.

Island County plainly lacks both a culture of conservation and the resources for effective conservation. It has minimal jurisdiction over the marine waters and has proven unwilling to voluntarily control land use to avoid impacts to these waters. A recent example involved the County "trading" tidelands recently donated to the County by the Whidbey-Camano Land Trust to allow armoring of the base of a bluff.² Island County lacks the necessary agency culture, expertise, and resources to be a serious advocate for conservation and protection of the lands in the Reserve or the adjacent waters.

Management by Washington State has not been sufficient to prevent the decline. While designation as an aquatic reserve by the Dept. of Natural Resources would be a step in the right direction, this still ignores the national character, status, and significance of these waters and their biota. That national significance has recently been recognized by Gov. Gregoire.

Creation of a National Marine Sanctuary will make additional resources available for reversing the ongoing decline and provide a mechanism for additional protection. Please include creation of a National Marine Sanctuary as part of the preferred option in the final General Management Plan and EIS. The geographic scope of the feasibility study should be the entire region of the northern Puget Sound and southern Georgia Straits, including all marine waters immediately adjacent to the reserve (i.e. the west side and Penn Cove). In this way, management and protection could be based on an ecologically rational area, instead of political boundaries.

2. Expansion of Reserve Boundaries

We strongly support the proposed expansion of the Reserve boundaries but believe they do not go far enough on Smith Prairie.

Including the eastern Crockett Lake wetlands is essential to achieving ecologically rational management. This area is currently undergoing serious and rapid invasion of the high salt marsh by the non-native plant species *Epilobium hirsutum* (Hairy Willow-herb). This invasion is occurring both in- and outside of the current Reserve boundaries. The geographic spread of these plants appears to be at an exponential rate. Left unchecked, I believe this species will colonize at

Congress authorized the Northwest Straits Marine Conservation Initiative in 1998 to look at strategies and solutions to the depletion of marine life and habitat in northern Puget Sound. The MRCs involve citizens and leaders of each county directly in discussions, decisions and restoration commitments.

The MRCs gather information and raise funds through grants to inventory local marine life and map its habitat. We share our findings with interested parties, including regulatory agencies and the public. We conduct educational programs, but cannot make or enforce laws--our role is to serve in a science-based advisory, educational and fund raising capacity, and to encourage stewardship of the marine resource.
<<http://www.islandcountymrc.org/>>

² This involved the county's granting of a variance to allow a very large house to be built within the bluff setback mandated by the county's growth management regulations for geologically hazardous areas. Within three years the bluff receded nearly 10 feet, threatening the new McMansion. The County traded the recently donated land to allow the property owner to armor the toe of the bluff. There was no public process or environmental review of the impacts of this action.

least the entire zone now occupied by *Potentilla anserina* (Pacific silverweed). This past summer, I located a small patch of this species on the northwest margin of the lake near the Ferry landing, the first time it has been detected on that side.³ This is an ecological catastrophe in the making, especially considering the high volumes of vehicular traffic through this area which can act as vectors for spread of seed throughout western Washington and southern B.C. This invasion is of such magnitude and rapidity that it needs to be disclosed and discussed within the DEIS. The local agency (Island County Noxious Weed Board) has failed to even “list” this species for control.⁴ Inclusion of this area within the reserve can help provide access to resources needed for control. It will also provide an overarching entity for consideration of larger scale restoration efforts of the Crockett Lake estuarine wetland complex.

WEAN strongly supports the inclusion within the Reserve boundaries of the NAS Whidbey Outlying Field on Smith Prairie, including the explicit recognition that if this land becomes surplus to the Navy’s needs, the Reserve might acquire it. This is essential for long-term protection of the Reserve’s southern gateway from incompatible industrial development. At least one current County Commissioner (Mac MacDowell) has openly stated his desire to see this land devolve to the County for use as an airport and for industrial development. This would simply be disastrous for the Reserve. However, we believe that the Reserve boundaries should be based on criteria that make bio-geographical sense. For this reason, the Reserve boundary should be extended to include all of the prairie soils on Smith Prairie. Please increase the proposed boundary enlargement in this way in the final preferred alternative.

3. WEAN strongly supports inclusion of the proposal for Island County to adopt a regulatory overlay zone for the unincorporated portion of the Reserve. 3-128. Given recent and ongoing impacts to the Reserve from development this is clearly warranted.

4. Special status plant species, *Aster curtus*, and Schoolhouse Prairie.

In discussions of special status species the DEIS inexplicably omits *Aster curtus* (= *Seriocarpus rigidus*) (White-topped aster). This species is considered by the U.S. Fish and Wildlife Service as a “Species of Concern;” it was formerly classified as a “Candidate” species for listing pursuant to the federal Endangered Species Act.⁵ It is listed by the Washington Natural Heritage Program as “Sensitive.” The small occurrence at Schoolhouse Prairie is the only known location on Whidbey Island and within the Reserve. Discussions of special status species, including explicit statements favoring and supporting conservation and restoration should include this species as well as *Castilleja levisecta* (Golden paintbrush).

³ This patch of *Epilobium hirsutum* was hand-pulled by Leigh Smith, NPS, and I. Also in this area is a patch of *Phragmites australis* (Common reed), the first time this invasive species has been located on Whidbey Island. This is on Washington State Park’s land. State Park personnel have now been shown the location and will be undertaking control efforts.

⁴ The EIS incorrectly refers to this species as having been designated for control by Island County (3-44). While designated as a “Class C” weed by Washington State, the Island County Noxious Weed Board has to date not designated this species for control in Island County. Under Washington’s noxious weed statutes, this local designation is necessary or there is no requirement for control. As a practical matter, without designation, state and local resources for control are considerably harder to obtain.

⁵ This category was abolished in 1997 by USFWS.

While at the time of settlement Schoolhouse Prairie was doubtless part of a much larger area of contiguous prairie that included Grassers Hill, it is now sufficiently isolated that it should be included and treated as a separate site with high restoration potential in all discussions of prairie remnants, priorities, funding, etc. (i.e. 3-102).

5. Natural resource tracking system.

The GMP should include, and the Park Service should explicitly commit to creation and management of a natural resource tracking system for the Reserve in concert with other interested parties, such as TNC, Au Sable, Whidbey Audubon, and WEAN. In particular, this should include invasive plant occurrences, rare species and communities, faunal species, etc. This would be complementary to the proposed tracking system for cultural resources. 3-115. Because it is the only managerial entity with responsibility for the entire Reserve area, the NPS is the logical entity to bear primary responsibility for this system, though cooperative arrangements will be necessary to assure that data is fed into the system and to make it available for use by others. Such a system is integral to realization of numerous of the proposed goals of the GMP. This sort of tracking system can help avoid catastrophes such as the invasion of *Epilobium hirsutum*, which though noted was ignored in its early phase.⁶

6. Early control of problematic invasive species.

Phalaris arundinacea (Reed canarygrass) is reported as present within the Reserve. 3-44. I am curious as to the source for this report and the location.

Ammophila arenaria (European beachgrass) is also listed as present within the reserve. 3-48. I am not aware of the presence of this species on Whidbey Island other than at West Beach at Deception Pass State Park. I am curious as to the source for this report and the location.

Since presence of either of these species is highly problematic, I recommend that if they occur within the Reserve and the occurrence is still small that they be promptly targeted for control.

Comments related to clarifications.

7. The discussion regarding WSDOT (3-70) should disclose and discuss the 1999 Hwy. 20 project in Penn Cove and its impacts to the globally imperiled plant community (at Schoolhouse Prairie) and possible direct impacts to a state listed Sensitive species (*Aster curtus*).

7. The EIS states that “There are only two remaining glacial outwash prairies in the northern Puget Sound region and one is Smith Prairie.” 1- 4-5; also, at 3-40, 4-174. This is arguable, depending on how prairie is defined (i.e. size and dominance of native species). However, the practical result is the same:

Native Puget Lowland grasslands are one of the most endangered types of ecosystems in Washington State. There are only two very few remaining glacial outwash prairies in the northern Puget Sound region and one is on Smith Prairie. This site (on land owned by Au Sable Institute) contains a rare, five-acre intact prairie plant community which is likely the largest and highest quality remaining in the northern Puget

⁶ Inexplicably, this species is not mentioned in the discussion of noxious weeds at 4-176. Considering that this invasive now likely occupies a larger contiguous area than any other single invasive within the Reserve and the species was unreported within the Reserve before 1999, this omission should be corrected.

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lowlands.

9. *Carex tumulicola* is reported as being abundant on the Au Sable land on Smith Prairie. 3-41. It is not. Both *C. tumulicola* and *C. inops* are present. I would term neither abundant at that site, certainly not in the sense that *C. tumulicola* is abundant at Schoolhouse prairie or *C. inops* is locally abundant on Ebey's Bluff.

10. On 3-41 the EIS states in reference to the prairie remnant on the Au Sable land:
The area qualifies as an "element occurrence" . . . listed in Washington Natural Heritage Plan as a "priority 3" for protection. It has also been proposed for addition to the Natural Vegetation Classification as an Idaho fescue-common camas-field chickweed association by Frosty Hollow Ecological Restoration, a Whidbey Island consulting firm. A total of four plant associations representing Puget lowland dry grasslands have been identified, and are included or proposed for addition to the National Vegetation Classification. All four of these associations are considered globally, critically impaired.

This is confusing. The National (not *natural*) Vegetation Classification system already includes the Idaho fescue-common camas-field chickweed association. Frosty Hollow has not proposed creating such a classification; rather, based on field data, Frosty Hollow concluded that the occurrence fits within this association. Citation should be made to the Washington Natural Heritage Plan. Finally, I suggest that the reference to Frosty Hollow be done in standard format, i.e.:

~~The area qualifies as an "element occurrence" . . . listed in Washington Natural Heritage Plan as a "priority 3" for protection. It has also been proposed for addition to the Natural Vegetation Classification identified as an Idaho fescue-common camas-field chickweed plant association by Frosty Hollow Ecological Restoration, a Whidbey Island consulting firm. (Frosty Hollow Ecological Restoration, 1999.)~~ The area This association is qualifies as an "element occurrence" . . . listed in Washington Natural Heritage Plan as a "priority 3" for protection. (Washington Natural Heritage Plan, Wash. St. Dept. of Natural Resources. 2003.)

11. The EIS incorrectly states that there are only two remaining "old growth or original forests on the Reserve." 3-40. Actually, there are three. The forest patch at Rhododendron Park has two cohorts of trees, respectively ~150 and ~350 years old. Because the soils on the site are so poor, these trees are relatively small; however, they are still of great age. More information can be obtained from Chris Chappell, Vegetation Ecologist for the Washington Natural Heritage Program. This site qualifies for inclusion in the Washington natural heritage system.

Rhododendron Park is referred to as a "developed park." 3-58. There are several service roads in the forest, the campground is without electrical power, and there are only vault privies. Campgrounds and parks in this condition are not usually classified as "developed." This classification only makes sense if the Island County developed baseball play field is included as within Rhododendron Park. The local perception is that Rhododendron Park is the forested area where the understory is dominated by *Rhododendron macrophyllum*, not the much smaller area deforested by Island County. The EIS also incorrectly states the size of this forest patch as only 10 acres. It is considerably larger than the total of 44 acres reported.

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The portion owned by the Dept. of Natural Resources has been transferred to Island County. Within 2 years of the final transfer, the County proposed extensive logging of the ancient and ecologically rare forest, including complete deforestation of a portion for new sports play fields. This effort was turned back by prompt and overwhelming public opposition - for now. The DEIS should disclose that this ecologically important forest has no protection and is threatened by recreational conflicts. Assuring conservation of this forest (and the forest at Camp Casey) should be an explicitly stated goal of the GMP.

12. Also, at several places, the EIS refers to the Heritage Forest at Camp Casey as a "Natural Heritage Forest Area." 3-40. While this forest patch has been adjudged by the Washington Natural Heritage Program as qualifying for listing on the Washington Register of Natural Areas, this action is voluntary on the part of the landowner.⁷ To date, Seattle Pacific University has not applied for the site to be registered or made any commitment to its conservation. I suggest rewording these references as:

... forest qualifying for listing on the Washington State Register of Natural Areas.

13. At several places, the EIS refers to "unique" plants. 3-40 ("... along the bluffs where unique flat-leaved cacti (*Opuntia fragilis*) occur") Also, 3-44, 4-181. "Unique" means one-of-a-kind and is not a term that is generally used by botanists or ecologists except for the most, er, "unique" circumstances and situations. These plants and their communities are regionally rare and in some cases disjunct (i.e. *Opuntia fragilis*), but not "unique."

14. *Castilleja levisecta* (Golden paintbrush) is listed by the state as endangered, not threatened.

⁷ The Washington natural area system includes various classifications and designations, depending on the ownership and degree of commitment to management for biodiversity values. See Washington Natural Heritage Plan: Land Management Designations: Their Role in Protecting Natural Biological Diversity in Washington. <http://www.dnr.wa.gov/nhp/refdesk/plan/land_mgmt_desig.pdf>. Of relevance here are Natural Forest Areas, Natural Area Preserves, and voluntary registration by private landowners on the Washington Register of Natural Areas.

"Natural Area Preserves" (NAPs) are owned by the state and managed by the Washington Natural Heritage Program first and foremost for their biodiversity values.

"Natural Forest Area" (NFA) is a designation for state park owned land that has ecological quality such that it would qualify for Natural Area Preserve status. There are two NFAs on Whidbey Island, in South Whidbey ("Classic U") and Deception Pass (Hoypus Hill) State Parks. This is within the most restrictive classifications possible for Washington State Parks and requires formal designation by the Washington Parks and Recreation Commission. Management recognizes the forest' natural values as pre-eminent.

Private landowners may register qualifying land on the Washington Register of Natural Areas. This registration is voluntary:

"One tool that should be evaluated carefully is the Washington Register of Natural Areas. This program has not been emphasized in recent years, due in large part to its lack of providing long-term certainty of protection. Because participation in the program is voluntary, protection is not permanent. However, the fact that the program is voluntary, and not regulatory, has great appeal for many people. This tool should be evaluated for its effectiveness in achieving conservation and for its potential to attract additional landowners to participate in the conservation of our natural heritage."

Washington Natural Heritage Plan. Part 2-27.

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3-44.

15. The discussion of *Iris missouriensis* (3-41) should disclose that this is the only known occurrence remaining west of the Cascade Mountain Range crest in Oregon, Washington, and Oregon.

16. "There are eight reported occurrences [of *Carex tumulicola* on] central Whidbey, including Grasser's Hill Schoolhouse Prairie. (Erickson 2004)." 3-41

One of these occurrences (at the West Beach Rd. Castilleja levisecta site) is outside of the Reserve. This site is also referred to at 3-44.

17. "One occurrence of Grass Widow (*Sisyrinchium bellum*) is known on central Whidbey. It occupies an area of several hundred square feet on upper portion of Grasser's Hill. . . . Also located here are over 1,000 plants of the Chocolate Lily (*Fritillaria lanceolata* = *F. affinis*)." 3-42.

The *Sisyrinchium* spp. is clearly within the *S. idahoense* complex, but which species needs additional clarification.

This occurrence of *F. affinis* is one of only a handful known within the range of the species where it achieves this extremely high abundance (1000's of plants). This density and high abundance are truly exceptional. *F. affinis* was regularly used as food by the aboriginal inhabitants, and the high abundance and density at this site may indicate long aboriginal use of the site for that purpose. (Personal communication, Linda Marsh. 2003.) Various other native herbaceous prairie species are also present at this site which include two five-acre parcels west of Skyline Drive, outside of the NPS scenic easement. These include:

<i>Achillea millefolium</i>	Yarrow
<i>Allium acuminatum</i>	Hooker's onion
<i>Brodiaea coronaria</i>	Northern saitas
<i>Carex tumulicola</i>	
<i>Castilleja miniata</i>	Scarlet paintbrush
(This taxon may be the poorly delimited <i>Castilleja miniata</i> var. <i>dixonii</i> .)	
<i>Cerastium arvense</i>	Field chickweed
<i>Danthonia californica</i>	California oatgrass
<i>Eriophyllum lanatum</i>	Woolly sun flower
<i>Festuca roemerii</i> (= <i>F. idahoensis</i> v. <i>roemerii</i>)	Roemer's, fescue
<i>Fritillaria affinis</i>	Chocolate lily
<i>Lomatium utriculatum</i>	Fern-leaved biscuit root
<i>Plectritis congesta</i>	Sea blush
<i>Pteridium aquilinum</i>	Bracken fern
<i>Ranunculus occidentalis</i>	Western buttercup
<i>Sanicula bipinnatifida</i>	Purple snakeroot
<i>Sanicula crassicaulis</i>	Yellow sanicula
<i>Sisyrinchium</i> spp.	Grass widow
(Within <i>S. idahoense</i> complex.)	
<i>Tritileia hyacinthina</i>	Hyacinth brodiaea
<i>Vicia americana</i>	American vetch

Because of the exceptional density and abundance of *Fritillaria affinis*, the presence of other

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typical prairie species including some that are locally rare, and the high potential for restoration of this site, I recommend acquisition of these two parcels for conservation purposes if possible.

18. The EIS states that “The Whidbey Environmental Action Network (WEAN) has identified 33 rare local plants unique to Whidbey Island. Only one was recently given protection by the county, the blue flag iris (Douthitt, December 23, 2000).” See our previous comment regarding use of the word “unique.” This contains several inaccurate statements. The report ranking these species was by Frosty Hollow Ecological Restoration, not WEAN. 22 of the species were ranked as locally endangered, threatened, or sensitive, the remainder were proposed for monitoring, not designation (as species of local importance) and protection. *Iris missouriensis* (Blue flag iris) has still not been designated by the County and receives no formal protection from the County. Some of the landowners on whose land this species occurs have agreed to temporarily forgo, for the time being, damaging activities in exchange for a tax reduction. Not all land owners of land on which the species occurs have done this. Long-term protection is still not assured, as it would be if the NPS’ scenic easement was enlarged and amended to explicitly protect this species. Also, note that the other native prairie species (i.e. the plant community) is only incidentally protected.

19. The list of species on 3-40 (“common species of salt marsh and beach vegetation”) is so mixed as to become a meaningless hodge-podge. It mixes three relatively well defined vegetation zones: salt marsh, littoral, and bluff face. It is also difficult to determine in all cases which species are referred to, since common names are used without any reference to botanical names.⁸ I suggest redoing this as several lists that include both botanical and common names. I also suggest denoting which are non-native. A photo from Ebey’s Bluff looking down at the lagoon and beach could be used to show the relative location of the three different zones (littoral, salt marsh, bluff face). Because this information is both intended for a non-technical audience and as a basis for technical description of existing conditions, changing the format in this way would increase its utility for both audiences. Though these species lists are not complete, anyone interested in more information can contact the Reserve.

* = non-native

Common salt marsh plant species at Crockett Lake and Perego’s Lagoon.

Grasses, sedges, and rushes

⁹ <i>Carex lyngbyei</i>	Lyngby sedge
<i>Distichlis spicata</i>	Salt grass
<i>Scirpus maritimus</i>	Small-fruited bullrush, Sea-coast bullrush
¹⁰ <i>Scirpus tabernaemontanii</i> (– <i>S. lacustris</i> spp. <i>validus</i>)	Softstem bullrush

This is the classification for which the SPU heritage forest and Au Sable prairie remnant qualify for. The status of Rhododendron Park vis-a-vis the natural area system is unclear.

⁸ I frankly do not know what species salt brush, everlasting pea vine, rock weed, or sea lettuce refer to.

⁹ A small patch of *Carex obnupta* (Slough sedge), a species generally not considered salt tolerant, is found at Perego’s Lagoon, 50 feet away from a larger patch of the salt tolerant *Carex lyngbyei*. A possible explanation for this unusual occurrence of *C. obnupta* would be the presence of a freshwater spring below the surface, however, it is not known if this is the case. The technical term for this unusual phenomenon is “weird.”

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<i>Triglochin maritimum</i>	Seaside arrowgrass
<i>Typhus latifolia</i>	Cattail
Herbs.	
* <i>Epilobium hirsutum</i>	Hairy Willow-herb
<i>Plantago maritima</i>	Seaside plantain
<i>Potentilla anserina</i>	Pacific silverweed, Silver cinquefoil
<i>Salicornia virginica</i>	Pickleweed

Common beach (littoral) plant species at Perego's Lagoon and Ebey's Bluff.

Grasses	
<i>Leymus mollis</i>	American beachgrass, Dune wild rye
Herbs	
<i>Abronia latifolia</i>	Sand verbena
<i>Cakile edule</i>	American sea rocket

Common bluff plant species on Ebey's Bluff.

Grasses	
* <i>Agrostis capillaris</i>	Creeping bent grass
* <i>Bromus rigidus</i>	Rigid brome
* <i>Dactylus glomerata</i>	Orchard grass
<i>Danthonia californica</i>	California oat grass
<i>Elymus mollis</i>	Blue wild rye
<i>Festuca roemerii</i> (= <i>F. idahoensis</i> v. <i>roemerii</i>)	Roemer's, fescue
* ¹¹ <i>Festuca rubra</i>	Red fescue
<i>Holcus lanatus</i>	velvet grass
<i>Poa pratensis</i>	Kentucky bluegrass
Lilies	
<i>Allium acuminatum</i>	Hooker's onion
<i>Brodiaea coronaria</i>	Northern saitas
<i>Tritileia hyacinthina</i>	Hyacinth brodiaea
Herbs	
<i>Achillea millefolium</i>	Yarrow
<i>Artemisia campestris</i>	Coastal mugwort
<i>Cerastium arvense</i>	Field chickweed
<i>Chrysopsis villosa</i>	Hairy chrysopsis
<i>Eriophyllum lanatum</i>	Woolly sun flower
<i>Grindelia integrifolia</i> (- <i>G. stricta</i> Kartez)	Gumweed
<i>Lupinus bicolor</i>	Chick lupine

¹⁰ This is the common tall bullrush in the Crocket Lake and Perego's Lagoon saltmarshes. It is frequently mistaken for *Scirpus acutus* (hardstem bullrush) which occurs at Lake Pondilla, but not, apparently in the estuarine wetlands.

¹¹ There are (apparently) both native and non-native varieties of *Festuca rubra* present.

<i>Lupinus littoralis</i>	Sea shore lupine
<i>Opuntia fragilllis</i>	
<i>Plantago lanceolata</i>	English plantain
<i>Pteridium aquilinum</i>	Bracken fern
<i>Sanicula bipinnatifida</i>	Purple snake root
<i>Trifolium tridentatum</i>	Tomcat clover
Shrubs and Trees	
<i>Pseudotsuga menzesii</i>	Douglas fir
<i>Rosa nutkana</i>	Nootka rose
<i>Symphoricarpos albus</i>	Snowberry
<i>Mahonia aquifolium</i>	Tall Oregon grape

20. The list of “common hedgerow species” omits *Mahonia aquifolium* (Tall Oregon grape). 3-42. The three most common species by far are *Rosa nutkana* (Nootka rose), *Symphoricarpos albus* (snowberry), and *Mahonia aquifolium* (Tall Oregon grape).

21. The discussion of hunting within the Reserve (3-58) should be updated to include the Island County Commissioners ongoing effort to open up the “Kettles” area to hunting and discuss the obvious user conflict.

22. Reference is made to potential impacts of climate change on the Reserve (3-30). For more up-to-date information, particularly modeling regarding expected rise in Puget Sound, contact the Climate Impacts Group at the University of Washington.
<<http://www.cses.washington.edu/cig/contact/contact.shtml>>

23. Frosty Hollow Ecological Restoration is referred to as a “conservation group.” 3-44. While Frosty Hollow’s work is in furtherance of conservation, it is a private for-profit (at least theoretically) business.

24. The reference to a “bio-blitz” in 2005 should be updated, since this did not happen. 3-102.

25. The EIS states that 30% of Island County is in the 5-acre Rural zone. 3-198. This is incorrect. Of the area within Island County’s land use jurisdiction, the Rural zone is over 65% of the area.

26. I suggest organizing the bibliography in a more standard format, such as:
Author last name, First name. Title. Publisher and location. Year published.
The individual references can then be referred to in the text by (Author last name, Year) and the bibliography can then be arranged alphabetically by author. This arrangement will make references within the text more concise and much easier to locate in the bibliography than the style used in the draft document.

27. Typographical errors.
“Coupeville Comprehensieve Plan”. 2-19.

“fire chickweed (*Cerastium arvense*). 3- 40-41. This should be Field chickweed.

“There are eight reported occurrences central Whidbey, including Grasser’s Hill Schoolhouse

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Prairie. (Erickson 2004).” This should be “Grasser’s Hill and Schoolhouse Prairie.”

“Common hedgerow plant species include . . . snowberry (*Symphoricarpos racemosus*),” 3-42. Presumably, *S. albus* is meant and not the less common *Sambucus racemosa* (Red elderberry).

The “Prairie overlook” photo in the pdf file does not show the prairie. 3-58

The discussion of visitor use has contradictory information as to age of youngest visitor and appears to reverse percentages:

According to the report, the average age of the sampled visitors, which included no one younger than 16, was approximately 47 years. Ages ranged from 16 to 85 years.

. . .
The largest group of visitors was comprised of two people (36 percent) with the second largest group comprised of four people (21 percent). Almost half of the visitor groups came with children 15 years or younger.



COUPEVILLE SCHOOL DISTRICT No. 204

...Dedicated to Knowledge, Character, and Creativity

September 16, 2005

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and educational agency.

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FROM: Mark W. Gale
RE: Public Comment – Draft of General Management Plan

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BY Pg DATE 12/1/05

My name is Mark Gale. I am a former Ebey's Landing National Historical Reserve (ELNHR) Board member, Coupeville High School history teacher and community member. I also led a team of K-12, Coupeville School District teachers that created an ELNHR curriculum for use in area schools on the history and importance of the Reserve. From my experience on the ELNHR Trust Board and my working with ELNHR since, I feel strongly that if Ebey's Landing National Historical Reserve is to continue and flourish, it must stay close to its roots. By that I mean that there must be a strong, local Trust Board. It was the local community that helped create and continues to support ELNHR. Without this strong local Trust Board, crisis in the future will be difficult to weather without strong local support. A "strong, local Trust Board" means that the Trust Board needs adequate resources to accomplish its' and the National Parks' goals – more resources than it now has. This can be accomplished with adequate staff, funds and access to technical assistance from the National Parks to expand its volunteer and educational functions. Adequate space to hold training and classes for the volunteers and public must be built or found. This would enable the Trust Board to do a professional job and thrive.

My comments on the Draft General Management Plan concern Educational Outreach and Interpretation and Education:

In terms of the wayside exhibit plan: I support the plan to increase access to the oral histories, documents and photos on an improved Reserve website. Widening access to tourists, students, researchers as well as the general public should be a priority as ELNHR is/was the nation's first historical reserve and has a unique partnership with local, county, state and national governmental bodies and therefore is the subject of much research.

Funding of an Educational/Volunteer Workshop Facility: With strong local Reserve administration and a significant National Park presence, educational opportunities could be expanded significantly. ELNHR is a non-traditional park with a blend of local, state and national partnerships. Funding of a workshop area/classroom for educational and volunteer programs and a funding of a coordinator would enable this non-traditional park to work more effectively with its partners. Already herculean efforts to create a curriculum for K-12 educators within the Reserve as well as an historical re-enactment with elementary and high school students at a

restored 1930s local one-room school house within the Reserve, has taken place with limited resources and local educators volunteering their time. What could be accomplished with an education/volunteer coordinator on staff?

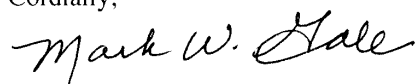
The creation of a volunteer/educational coordinator seems timely and necessary. The Reserve Manager cannot possibly manage as well as coordinate and initiate an educational/volunteer program in addition to his other duties. Many local and state organizations already use volunteers. The Central Whidbey Island area has a history of well educated, dedicated, knowledgeable volunteers in the schools, at the county museum and state park sites such as Fort Casey, Fort Ebey and the Washington State University Beach Watchers as well as the Admiralty Head Lighthouse, all within the Reserve. An extensive pool of volunteers exists in the Reserve that has not been tapped. Many of them are active, bright retirees with extraordinary backgrounds and skills. A chance to expand interpretive education lacks only experienced, creative personnel to oversee it. Such a move makes the finding of a suitable administration building for such education of volunteers, classroom and workshop space a priority, in my estimation. The opportunity for a field school and/or environmental and interpretive presentations is waiting for coordination. Besides the Reserve, its historic structures and natural beauty, there is the chance to form even more beneficial partnerships with the Island County History Museum, Au Sable (a worldwide Christian University affiliated environmental educational agency on Smith Prairie) as well as Island County schools and other non-profit agencies and governmental bodies. An educational/volunteer coordinator position would enable the expansion of this Reserve's present partnerships and expand its interpretation and research capabilities.

Creation of Marine Science Interpretation: The WSU Beach Watchers program has created an opportunity to expand the Reserve's Marine Sciences Interpretation by obtaining equipment and interpretive materials from a defunct Puget Sound area program in Poulsbo, Washington. With the resources of Au Sable, the Reserve can play a significant roll in expanding marine interpretation within the Reserve. Marine interpretation within the Reserve is relatively non-existent at the present, and yet the Reserve is on an island and surrounded by the Pacific Ocean, Puget Sound, Penn Cove, Saratoga Passage and the Strait of Juan de Fuca .

Funding of a Library/Research/Archives Facility: There is also a need for Cultural Resource Management to create and manage an archives and library to facilitate historical research. The educational/volunteer coordinator or a separate research librarian is needed. Workshops, community volunteer programs, classes and library and historical research could take place within the Reserve if larger facilities were available.

These programs and facilities need to be included in Alternative 'B' in the General Management Plan and need to be appropriately funded for the Reserve to accomplish the above recommendations.

Cordially,

A handwritten signature in black ink that reads "Mark W. Gale". The signature is written in a cursive style with a large, stylized 'M' and 'G'.

Mark W. Gale
1213 N.E. Leisure
Coupeville, WA. 98239
(360) 678-6837
mlgale@comcast.net



COUPEVILLE SCHOOL DISTRICT No. 204

...Dedicated to Knowledge, Character, and Creativity

October 18, 2005

School District

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Coupeville, WA 98239
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FAX 360-678-4834

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Superintendent

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Business Manager

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Office Manager
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Maintenance Department

Gary Smart
360-678-3935

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Helen St. Amand
360-678-6407

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Coupeville, WA 98239
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David Stockard
Director

Elementary School

6 South Main Street
Coupeville, WA 98239
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Fran McCarthy
Elementary School Principal

Middle & High School

501 South Main Street
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FAX 360-678-0540

David Ebersole
Middle School Principal

Sheldon Rosenkrance
High School Principal

The Coupeville School
District is an equal
opportunity employer
and educational agency.

Ebey's Landing NHR
General Management Plan
National Park Service
909 1st Avenue, Suite 500
Seattle WA 98104-9882

Re: Growth Management Plan

Dear Park Service and Trust Board Members:

The Coupeville School District Board of Directors appreciates the opportunity to comment on the proposed Growth Management Plan for the Ebey's Landing National Historic Reserve. The summary document as well as the two volumes of detailed information reflect a comprehensive review of the Reserve's history and possible future paths.

Broadly speaking, the district is concerned that alternatives B or C would have a detrimental impact on the Coupeville School District's ability to use property it owns for expansion of school programs and services. As we reviewed the areas of:

- historic buildings and structures,
- geology, soils, and air resources,
- vegetation,
- appropriate uses,
- protection of scenic lands, roadsides, and vistas, and
- land use measures

we perceived a greatly expanded role for the Trust Board under alternatives B and C. We anticipate that the Trust Board's enhanced regulatory authority beyond what currently exists could lead to unworkable restrictions for development of the district's property in general, and specifically the property adjacent to our elementary school and extending west to Ebey Road.

The school board is unanimous in perceiving that the Reserve contributes to the quality of life in central Whidbey Island. We also are unanimous in our opinion that a vibrant community, including attractive and thriving schools, is essential to that quality of life.

The district owns land that is ideal for expansion of our programs and that falls within a "highly valued landscape" area. While we recognize and fully intend to work with the Trust Board on issues such as night lighting, building design and siting, landscaping, etc., we also feel that it is imperative that greater restrictions than already exist not be developed or imposed on the district. The anticipated uses for all district property will be included in a long range plan currently being

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developed by the district. These uses may include construction of a new school or, at a minimum, expansion of the existing elementary school.

It is not feasible for the district to consider acquiring other property for this use, not only due to current purchase prices, but also because there are no water and sewer facilities able to accommodate a school.

The school district's Board of Directors submits these comments with appreciation and respect for all that the Trust Board has accomplished, and with a commitment to work collaboratively with the Trust Board in the future.

Sincerely,



Don Sherman, President
Coupeville School District Board of Directors

c: Ebey's Reserve Trust Board

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AU SABLE INSTITUTE
OF ENVIRONMENTAL
STUDIES



Administration Office
3770 Lake Drive SE, Grand Rapids, MI 49546
616.526.9952 Fax 616.526.9955 www.ausable.org

Great Lakes Campus & Admissions Office
7526 Sunset Trail, NE, Mancelona, MI 49659
231.587.8686 Fax 231.587.5353

Pacific Rim Campus
180 Parker Road, Coupeville, WA 98239
360.678.5586 Fax 360.678.0216

52

30 November 2005

Ebey's Trust Board
Ebey's Landing National Historical Reserve
Coupeville, WA

Dear Rob,

The Board and staff of the Au Sable Institute of Environmental Studies are most excited about the General Management Plan for Ebey's Landing National Historical Reserve. We have read the Plan and support the items that bring Au Sable and Ebey's Landing into a close working relationship.

Au Sable Pacific Rim and Ebey's Landing National Historical Reserve have already enjoyed a collegial partnership since we established our newest campus on the site of the old Game Farm on Smith Prairie in 1999. We see your GMP as being a critical factor in the challenge of laying solid stewardship groundwork for central Whidbey Island. It is also a model for other parts of the country.

You can count on Au Sable, and in particular our Pacific Rim staff and campus to prioritize our already excellent collaboration with Ebey's Landing for the benefit of the people of Whidbey Island, and all of God's creation.

Sincerely Yours,

Roger Brummel, PhD.
CEO/Director

DEC 9 2005

Agency Consultation and Coordination

The following discussion documents the consultation and coordination efforts undertaken by the NPS during the preparation of the draft GMP/EIS. Consultation is considered an on-going effort for development of a GMP/EIS. All local governments, tribal governments, and federal and state agencies with resource management responsibilities or interests in the Reserve were informed of the planning effort and encouraged to participate. Throughout the planning process, these agencies were updated with newsletter mailings to keep them informed of the status of the planning effort. The planning team also made several presentations at special interest group meetings, as well as provided information through newsletter mailings and personal calls. Congressional officials were kept updated by newsletter mailings. Appendices F, G, and H contain copies of letters exchanged during the agency consultation process.

Section 106 Compliance

Consultation with Native American Tribes

In keeping with the provisions of NEPA and NHPA, Native American tribes within the vicinity of the Reserve were contacted. In October 2001, the Chairman for the Swinomish Tribal Community was contacted and informed about the initiation of the GMP. Subsequently, tribal staff have met with Reserve staff on several occasions to get further information and to provide comments and recommendations.

Consultation with the Washington State Historic Preservation Officer and the Advisory Council on Historic Preservation

The State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation must be consulted concerning any resource management proposals that might affect a cultural property listed on or eligible for the National Register of Historic Places. Consultation with the Washington State SHPO and the Advisory Council for Section 106 of the National Historic Preservation Act, as amended, has been ongoing throughout the planning process. (See Appendix F: Letters for 106 Compliance-NHPA.)

Section 7 Consultation

Consultation with U.S. Fish and Wildlife Service

The Endangered Species Act of 1973, as amended, authorizes federal agencies to enter into early consultation with the USFWS to ensure that any federal action would not jeopardize the existence of any listed species or destroy or adversely modify its habitat. Consultation with the USFWS for species information relating to the Reserve was initiated in January 2000 and updated in April 2004. (See Appendix G: Letters for Section 7 Consultation-ESA.)

Consultation with Washington State Natural Resource Agencies

In addition to the USFWS, the NPS contacted the Washington State Department of Fish and Wildlife and the Washington Natural Heritage Program (within the Washington State Department of Natural Resources) in December 2000 for species information for the Reserve. This information was used in conjunction with the USFWS species information.

Consultation with Washington State Coastal Zone Management Program

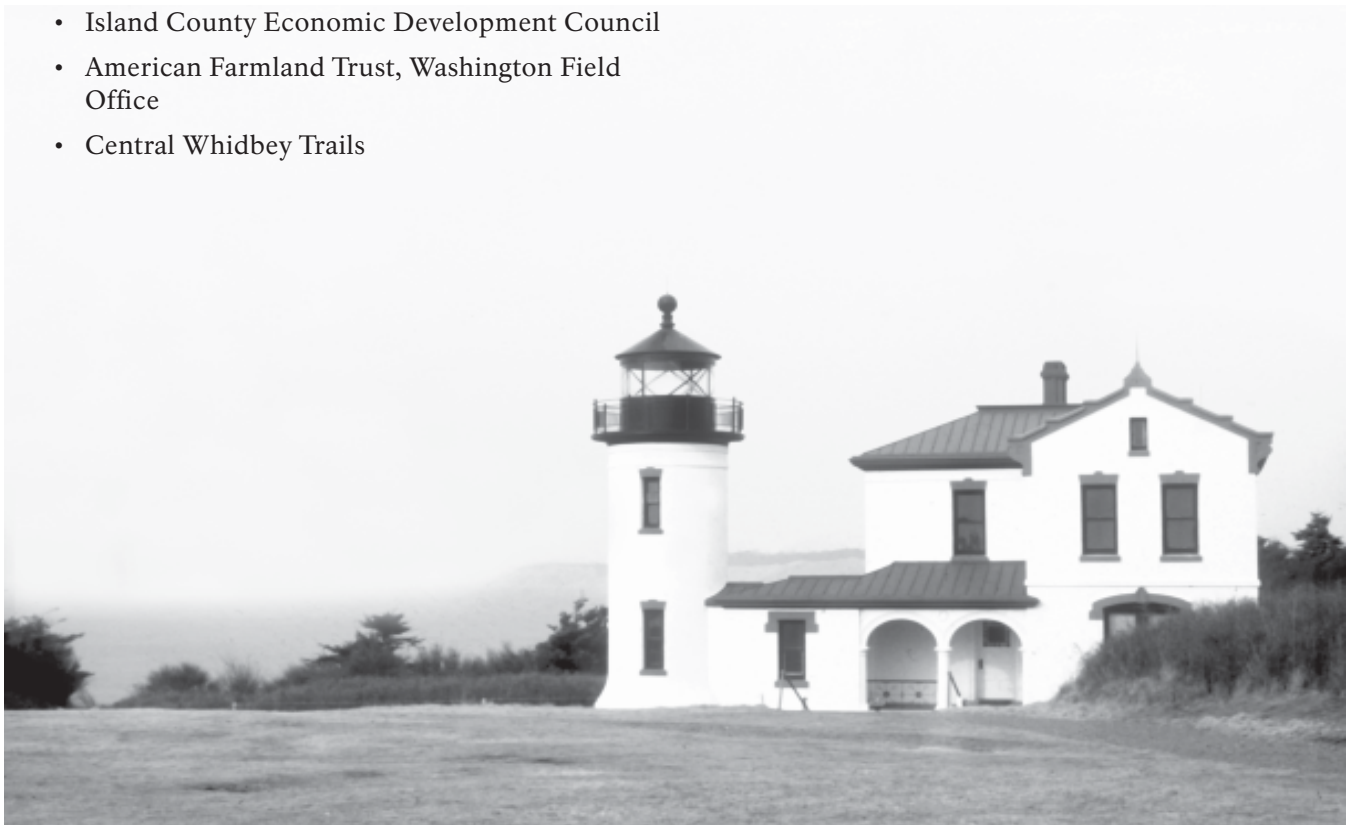
Since the Reserve is located within the jurisdiction of the Washington State Coastal Zone Management Program, the NPS has been in contact with the Federal Consistency Coordinator to ensure that the GMP/EIS meets the federal requirements under the Coastal Zone Management Act (CZMA). This program is coordinated by the Washington State Department of Ecology. (See Appendix H: Federal Consistency-Washington State Coastal Zone Management Program.)

Coordination with Other Organizations and Groups

The planning team also made several presentations during the scoping period to special interest groups. These groups included the following:

- The Nature Conservancy
- Au Sable Institute
- Washington State Parks
- Town of Coupeville, Planning Department
- Island County, Planning and Community Development
- Island County Engineering
- Pacific Northwest Trail Association
- Washington Environmental Action Network
- Whidbey Audubon
- Washington State Department of Transportation
- Whidbey Camano Land Trust
- Naval Air Station—Whidbey (Ecologist)
- Seattle Pacific University, Planning, Facilities, and Guest Services divisions
- Island County Chamber of Commerce
- Island Transit
- Island County Economic Development Council
- American Farmland Trust, Washington Field Office
- Central Whidbey Trails

Following release of the draft GMP/EIS, there was 90-day public review period including public meetings, after which time the comments received were gathered, analyzed, and used to complete and produce this final GMP/EIS. This Final GMP/EIS will be released for a 30-day no-action period. After this period, a Record of Decision will be signed by the NPS Regional Director. The plan can then be implemented, subject to funding and additional environmental analysis for site-specific actions.



Land Protection Strategy Plan

The purpose of the Plan is to assist Reserve staff in identifying methods, funding, and priorities for protecting significant properties within the Reserve. This will enable Reserve and NPS staff to act quickly when funding opportunities or development threats arise. The land protection strategy plan identifies the specific lands that are most valuable and most vulnerable; those lands containing the highest scenic, historic, agricultural, and natural resource integrity, that are also least protected by current controls. This plan was completed by contractors working for the Trust Board. It was approved by the Trust Board in 2004 and will give guidance to the subsequent NPS land protection plan for the Reserve. The NPS expects that this plan will be released to the public following publication of the *Ebey's Landing National Historical Reserve General Management Plan/Environmental Impact Statement*.

Public Meetings

The public meetings provided a forum for the public to respond to draft criteria for determining land protection priorities. It also allowed the opportunity for the public to give written comment on what Reserve lands they thought were most important to protect.

Two public workshops were conducted by Reserve staff on the development of the land protection strategy plan for Ebey's Landing National Histori-

cal Reserve. The first workshop was held on February 18, 2003 and focused on the entire Reserve. The second workshop, held on February 26, 2003, specifically addressed the town of Coupeville. Both workshops were held at the Recreation Hall in Coupeville. Thirty-three attended the first workshop and 42 people attended the second. Workshops were hosted by the Reserve Trust Board and staff. The public was asked to write comments on numbered sheets corresponding to Character Area maps. These Character Area maps, with corresponding public comment numbers, are part of the GMP administrative record and are available for review at the Reserve Trust Board office.

Public Notification

Written comments were also accepted by surface and electronic mail. Press releases were sent to local newspapers announcing the public meetings. In addition, letters were sent to the following groups:

- Agricultural Forestry Council
- American Farmland Trust
- Au Sable Institute
- Central Whidbey Fire District
- Civilian Conservation Corps
- Coupeville School District Board
- Crockett Lake Diking District
- Farm Service Agency
- Governor's Office of Indian Affairs



Island County Commissioners

- Island County Conservation Futures Fund Board
- Island County Economic Council
- Island County Marine Resources Committee
- Island County Parks
- Island County Salmon Recovery Lead Entity
- Island County Trails Council
- Port of Coupeville District
- Seattle Pacific University
- Sunnyside Cemetery District
- The Nature Conservancy
- Town of Coupeville
- Trust for Public Land
- U.S. Navy Recreation Department, Environmental Affairs Office
- Washington Department of Fish and Wildlife
- Washington Department of Natural Resources
- Washington Department of Transportation
- Washington Native Plant Society
- Washington State Parks
- Washington State University Beach Watchers
- Whidbey Audubon Society
- Whidbey Environmental Action Network
- Whidbey Camano Land Trust
- Whidbey General Hospital Board
- Whidbey Island Conservation District
- Whidbey Island Realtor Boards

Written Comments

Public comments were gathered over a public comment period from February 2003 through March 2003. A total of 264 comments were received. Comments were compiled for the purpose of incorporating public feedback into the land protection strategy plan for the Reserve.

Areas Outside the Reserve

- Several commentors recommended expanding the Reserve to include areas north and east of the current Reserve boundaries.

Coupeville Character Area

- Several commentors recommended protecting specific structures in the town as important historical features.
- Many commentors recommended protecting specific property areas as being of importance to the Reserve.
- Several people recommended expanding the town's historic district.
- Several commentors recommended that cell phone towers not be permitted near the elementary school.

Crockett Prairie Character Area

- Many commentors stressed the importance of Crockett Lake and marshes as valued wildlife habitat and scenic views.
- Several commentors recommended greater protection for several areas in Crockett Prairie.
- One person recommended acquisition of the restaurant adjacent to the Keystone Ferry for use as a Reserve interpretive center.



Ebey's Prairie Character Area

- Many commentors stressed the importance of protecting farmland in the prairie and the rural character of the entrances into Coupeville.
- Several people recommended increased protection for a number of specific natural features and areas.
- Several commentors stressed the need to protect types of flora.
- Several participants recommended specific projects within the area.

Fort Casey Uplands Character Area

- Many commentors stressed the importance of protecting natural features.

Kettle and Pratt Woodland Character Area

- Several commentors addressed the need to protect various forested areas within this Character Area.
- Several participants addressed protecting shorelines along the coast and in Penn Cove from development pressures.
- Several commentors recommended developing trail networks in the woodlands and one recommended extending the boundaries of Fort Ebey State Park as much as possible.

Parker and Patmore Woodland Character Area

- Several people recommended protecting Native American population sites and archaeological areas and placing more emphasis on Native American human history in the Reserve.

Penn Cove Character Area

- A number of commentors recommended more protection for the sea life of the cove and the banning of jet skis.

San de Fuca Uplands Character Area

- Several commentors recommended protecting various areas and historic structures.
- Several people stressed the need to protect various areas of the shoreline of Penn Cove to preserve them from development.

Smith Prairie Character Area

- Several commentors recommended specific areas for protection.

West Coastal Strip Character Area

- Many participants stressed the importance of these areas for public access and enjoyment and the need to protect the scenic views, natural features and plants along the bluffs.

Trails and Public Access

- There were numerous recommendations addressing the importance of protecting public access to trails throughout the Reserve and developing a comprehensive trail network for hikers, cyclists and equestrians.

List of Preparers and Cooperating Entities

Planning Team Composition and Functions

Ms. Deanne Adams

Chief of Interpretation, NPS Pacific West Region, San Francisco, California; Interpretation Issues

Mr. Brett Bayne

Former Trust Board Member, Washington State Parks and Recreation Commission Representative, Ebey's Landing National Historical Reserve, Coupeville, Washington; Direct Park Management and Policy Issues

Capt. Marshall Bronson (U.S. Navy, retired)

Trust Board Member, Town of Coupeville Representative, Ebey's Landing National Historical Reserve, Coupeville, Washington; Direct Park Management and Policy Issues

Mr. Kermit Chamberlin

Former Trust Board Member, Island County Representative, Ebey's Landing National Historical Reserve, Coupeville, Washington; Direct Park Management and Policy Issues

Mr. Theo K. Chargualaf

Landscape Architect, formerly with NPS Pacific West Region—Seattle Office, Seattle, Washington; Draft GMP/EIS Design and Production, Layout, and Review; Analysis of Related Plans; Newsletter Editing, Design, and Production

Mr. Keith Dunbar

Chief of Planning and Compliance for the NPS Pacific West Region, Former Project Manager, Seattle, Washington

Mr. Bob Fisher

Former Trust Board Member, Washington State Parks and Recreation Commission Representative, Ebey's Landing National Historical Reserve, Coupeville, Washington; Direct Park Management and Policy Issues

Mr. Michael Hankinson

Historical Landscape Architect, NPS Pacific West Region—Seattle Office, Seattle, Washington; Development Concept Plans.

Mr. Rob Harbour

Reserve Manager, Ebey's Landing National Historical Reserve, Coupeville, Washington; Park Management and Operations, Coordination with Ebey's Landing National Historical Reserve Trust Board

Mr. Craig Holmquist

Trails Maintenance Supervisor, North Cascades National Park Service Complex, Sedro-Woolley, Washington; Historic Buildings and Trails Inventory Assistance

Ms. Barbara Holyoke

Realty Specialist, NPS Pacific West Region—Seattle Office, Seattle, Washington; Lands Issues

Ms. June Jones

Regional Web Coordinator, NPS Pacific West Region—Seattle Office, Seattle, Washington; Web Support for Public Information

Ms. Amanda Kaplan

Fire Program Analyst, NEPA Compliance Program Leader, NPS Pacific West Region—Seattle Office, Seattle, Washington; Environmental Impact Statement and Fire Issues

Mr. Jim Konopik

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Mr. Bob Lappin

Former Trust Board Member, Town of Coupeville Representative, Ebey's Landing National Historical Reserve, Coupeville, Washington; Direct Park Management and Policy Issues

Mr. Michael Larrabee

Physical Science Technician, North Cascades National Park Service Complex, Marblemount, Washington; Natural Resources Data

Mr. George Lloyd

Trust Board Member, Island County Representative, Ebey's Landing National Historical Reserve, Coupeville, Washington; Direct Park Management and Policy Issues

Ms. Gretchen Luxenberg

Historian and NPS Cultural Resource Specialist, NPS Pacific West Region—Seattle Office, Seattle, Washington and Trust Board Member, Ebey's Landing National Historical Reserve; Cultural Resources 106 Compliance Coordinator for National Historic Preservation Act, Cultural and Recreational Resource Issues

Ms. Emily McLuen

GIS Specialist, NPS Pacific West Region—Seattle Office, Seattle, Washington; Spatial Analysis and Cartography

Jack McPherson

Trust Board Member, Town of Coupeville Representative, Ebey's Landing National Historical Reserve, Coupeville, Washington

Mr. Bob Merrick

Trust Board Member, Town of Coupeville Representative, Ebey's Landing National Historical Reserve, Coupeville, Washington; Direct Park Management and Policy Issues

Ms. Amanda Schramm

Planning Intern, NPS Pacific West Region—Seattle Office, Seattle, Washington; Production of Final GMP.

Mr. Richard Smedley

Prescribed Fire Specialist, NPS CCSO, Portland, Washington; Fire Issues

Mr. Leigh Smith

Resources Management Specialist, Ebey's Landing National Historical Reserve,

Coupeville, Washington; Natural Resource Issues

Ms. Sara Street

Trails Laborer, North Cascades National Park Service Complex, Marblemount, WA; Natural Resources Data

Ms. Cheryl Teague

Landscape Architect, NPS Pacific West Region—Seattle Office, Seattle, Washington; Project Manager, Visual Analysis Issues, Scenic Resources, and Public Involvement; Newsletter and GMP Editor and Coordinator

Mr. Jim Thomson

Archaeologist, NPS Pacific West Region—Seattle Office, Seattle, Washington; Archaeology Issues

Dr. Stephanie Toothman

Chief of Cultural Resources, NPS Pacific West Region—Seattle Office, Seattle, Washington; Cultural Resource Issues

Mr. Ron Van Dyk

Trust Board Member, Town of Coupeville Representative, Ebey's Landing National Historical Reserve, Coupeville, Washington; Direct Park Management and Policy Issues

Mr. Rick Wagner

Chief, Land Resources Program Center, NPS Pacific West Region—Seattle Office, Seattle, Washington; Analysis of Lands Issues and Boundary Modification Issues

Ms. Benye Weber

Former Trust Board Member, Island County Representative, Ebey's Landing National Historical Reserve, Coupeville, Washington; Direct Park Management and Policy Issues

Ms. Arlene Yamada

Administrative Support Assistant, NPS Pacific West Region—Seattle Office, Seattle, Washington; Document Production Support

Dr. Frederick F. York

Regional Anthropologist, NPS Pacific West Region—Seattle Office, Seattle, Washington; Consultation and Background Information on Tribal Issues

Consultants

Mr. Tom Belcher

Facilities Manager, North Cascades National Park Service Complex, Sedro-Woolley, Washington; Facilities Maintenance Issues

Ms. Amy Cragg

Landscape Architecture graduate student at the University of Washington, Seattle, Washington; Five-acre Zoning Build-out Scenarios (photo simulation) in Chapter 4.

Mr. Nathaniel Cormier

Landscape Architect, Jones & Jones Architects and Landscape Architects, Seattle, Washington; Agricultural Preservation Study

Mr. Craig Dalby

GIS Specialist, NPS Pacific West Region—Seattle Office, Seattle, Washington; Spatial Analysis and Cartography

Mr. Steve Gibbons
Natural Resources Section 7 Consultation
under the Endangered Species Act, NPS Pacific
West Region—Seattle Office, Seattle,
Washington; Natural Resource Compliance

Mr. Mark MacKay
Production Director, Northwest Interpretive
Association, Seattle; Washington, Scoping
Newsletter Design and Production

Ms. April Mills
Landscape Architect Intern, Jones & Jones
Architects and Landscape Architects, Seattle,
Washington; Cultural Landscape Project, GIS
Specialist

Ms. Nancy Rottle
Former Landscape Architect with Jones &
Jones Architects and Landscape Architects,
Seattle, Washington; Cultural Landscape and
Agricultural Preservation Project Lead

Other Cooperating Entities

Ms. Harriet Allen
Endangered Species Section Manager,
Washington Department of Fish and Wildlife,
Olympia, WA; Section 7 Consultation under the
Endangered Species Act

Dr. Allyson Brooks
Washington State Historic Preservation Officer,
Olympia, Washington; 106 Compliance under
the National Historic Preservation Act

Ms. Jane Crisler
Historic Preservation Specialist, Advisory
Council on Historic Preservation, Lakewood,

Colorado; 106 Compliance under the National
Historic Preservation Act

Mr. John Engbrink
U.S. Fish and Wildlife Service, Lacey,
Washington; Section 7 Consultation under the
Endangered Species Act

Mr. Chris Gebhardt
NEPA Reviewer, Geographic Implementation
Unit, U.S. Environmental Protection Agency,
Region 10, Seattle, WA

Ms. Sandy Swope Moody
Environmental Coordinator, Washington
Natural Heritage Program, Olympia, WA;
Section 7 Consultation under the Endangered
Species Act.

Ms. Linda Rankin
Federal Consistency Coordinator, Department
of Ecology, SEA Program, Olympia,
Washington: Federal Consistency Compliance
under the Coastal Zone Management Act.

List of Agencies, Organizations, and Persons to Whom Copies of the GMP/EIS Were Sent

Federal Agencies and Officials

Advisory Council on Historic Preservation,
Western Office of Project Review, Lakewood,
CO

Coast Defense Study Group Coupeville, WA
Craters of the Moon National Monument,
Arco, ID

Department of Interior, Office of Regional
Solicitor, Portland, OR

Ebey's Landing National Historical Reserve,
Trust Board Members, Coupeville, WA

Fort Clatsop National Memorial, Astoria, OR
Fort Vancouver National Historic Site,
Vancouver, WA

John Day Fossil Beds National Monument,
Kimberly, OR

Klondike Gold Rush National Historical Park,
Seattle, WA

Mount Rainier National Park, Longmire, WA
National Park Service, Pacific West Region,
Seattle, WA

Naval Air Station Whidbey, Environmental
Affairs, Oak Harbor, WA

Naval Air Station Whidbey, Morale, Recreation
and Welfare, Oak Harbor, WA

Naval Air Station Whidbey, Public Affairs, Oak
Harbor, WA

North Cascades National Park Service
Complex, Sedro-Woolley, WA

North Cascades National Park Service
Complex, Marblemount Field Office,
Marblemount, WA

Oregon Caves National Monument, Cave
Junction, OR

San Juan Island National Historical Park, Friday
Harbor, WA

Whitman Mission National Historic Site, Walla
Walla, WA

U.S. House of Representatives, Washington,
D.C., 6th District, Honorable Norm Dicks,
Tacoma, WA

U.S. House of Representatives, Washington,
D.C., 2nd District, Honorable Rick Larsen,
Everett, WA

U.S. Environmental Protection Agency, Region
10, Seattle, WA

U.S. Senate, Washington, D.C., Honorable
Maria Cantwell, Seattle, WA

U.S. Senate, Washington, D.C., Honorable Patty
Murray, Seattle, WA

State and Local Agencies and Officials

Coupeville Port District, Coupeville, WA

Department of Natural Resources Public
Affairs, Olympia, WA

Fort Casey State Park, Coupeville, WA

Fort Ebey State Park, Coupeville, WA

Island County Board of Commissioners,
Coupeville, WA

Island County Historical Review Committee,
Coupeville, WA

Island County Parks Department, Coupeville,
WA

Island County Planning and Community
Development Department, Coupeville, WA

Island County Public Works Department,
Coupeville, WA

Island Transit, Coupeville, WA

Office of Archaeology and Historic
Preservation, Olympia, WA

Town of Coupeville Design Review Board,
Coupeville, WA
Town of Coupeville, Mayor, Coupeville, WA
Town of Coupeville Planning Commission,
Coupeville, WA
Town of Coupeville, Town Council, Coupeville,
WA
Town of Coupeville, Town Planner, Coupeville,
WA
Washington State Office of Archaeology,
Olympia, WA
Washington State Parks and Recreation,
Northwest Headquarters, Burlington, WA
Washington State Representative, 10th District,
Honorable Kelly Barlean, Langley, WA
Washington State Representative, 10th District,
Honorable Barry Sehlin, Olympia, WA
Washington State Senate, 10th District,
Honorable Mary Haugen, Camano Island, WA
Whidbey Island Conservation District,
Coupeville, WA

Tribes

Swinomish Indian Tribal Community, La
Conner, WA

Organizations

American Farmland Trust, Puyallup, WA
Au Sable Institute of Environmental Studies,
University of Wisconsin, Madison, WI
Central Whidbey Chamber of Commerce,
Coupeville, WA
Central Whidbey Trails Council, Langley, WA
Clinton Chamber of Commerce, Clinton, WA
Continuum History & Research, Sedro-
Woolley, WA
Coupeville Arts Center, Coupeville, WA
Coupeville Festival Association, Coupeville, WA

Freeland Chamber of Commerce, Freeland, WA
Greenbank Farm Management Group,
Greenbank, WA
Island County Historical Society, Coupeville,
WA
Island District Economic Development
Council, Coupeville, WA
National Parks and Conservation Association,
Seattle, WA
National Trust for Historic Preservation,
Washington, D.C.
National Trust for Historic Preservation, San
Francisco, CA
Northwest Interpretive Association, Seattle, WA
Oak Harbor Chamber of Commerce, Oak
Harbor, WA
Pacific Forest Trust, Seattle, WA
San Juan Preservation Trust, Lopez, WA
Seattle Audubon Society, Seattle, WA
Skagit Island Builders Association, Burlington,
WA
South Whidbey Historical Society, Langley, WA
The Conservation Fund, Southwest
Representative, Green Valley, AZ
The Nature Conservancy, Washington Field
Office, Seattle, WA
The Wilderness Society, Pacific Northwest
Region, Seattle, WA
Trust for Public Land, Seattle, WA
Washington Native Plant Society, Seattle, WA
Washington Trails Association, Seattle, WA
Washington Trust for Historic Preservation,
Seattle, WA
Whidbey Audubon Society, Langley, WA
Whidbey Camano Land Trust
Whidbey Environmental Action Network,
Langley, WA

Whidbey Island Association of Realtors, Oak Harbor, WA

Whidbey Island South Association of Realtors, Langley, WA

Whidbey Tours, Coupeville, WA

Business and Industry

Clifton View Homes, Coupeville, WA

Coupeville Inn, Coupeville, WA

Eastman Company, Agoura Hills, CA

Fantastic Foods, Coupeville, WA

Oles, Morrison & Rinker LLP, Seattle, WA

Schaefer & Bratton, Coupeville, WA

VARGAS, Sedro-Woolley, WA

Wessen & Associates, Seattle, WA

Whidbey Island B & B Association, Langley, WA

Windermere/Center Isle Realty, Coupeville, WA

Yonkman Construction, Oak Harbor, WA

Schools, Libraries, and Institutions

Coupeville School District, Coupeville, WA

Coupeville Town Library, Coupeville, WA

Freeland Public Library, Freeland, WA

Langley Public Library, Langley, WA

Seattle Pacific University, Camp Casey, Coupeville, WA

Seattle Pacific University, Seattle, WA

Skagit Valley College, Whidbey Island Campus, Oak Harbor, WA

University of Wisconsin, Madison, WA

Media

Anacortes American, Anacortes, WA

South Whidbey Record, Langley, WA

Stanwood Camano News, Stanwood, WA

The Coupeville Examiner, Coupeville, WA

The Seattle Times, Seattle, WA

The Seattle Post-Intelligencer, Seattle, WA

Whidbey News Times, Oak Harbor, WA

Individuals

533 private individuals on the mailing list