



# CHAPTER 7: PUBLIC INVOLVEMENT

*Public involvement and consultation efforts were ongoing throughout the process of preparing this GMP/EIS. Public involvement methods included submitting Federal Register notices, sending press releases, conducting public meetings and workshops, holding stakeholder meetings, distributing newsletters, and posting to appropriate websites. Public involvement is a necessary and important part of the planning process that provides valuable information.*

## PUBLIC SCOPING

A Notice of Intent to prepare an environmental impact statement for San Juan Island National Historical Park was published in the *Federal Register* on February 5, 2003 (Volume 68, Number 24, page 5919-20). In the spring of 2002, the National Park Service organized an interdisciplinary planning team consisting of staff at San Juan Island National Historical Park and the NPS Pacific West Regional Office in Seattle, Washington to begin a GMP for the park. The last general management plan was prepared in 1979.

The official public scoping process began in March 2003 when the NPS produced and mailed a newsletter to 216 people on the park's mailing list. In addition, 4,000 copies of the newsletter were inserted into the *The Journal of the San Juan Islands*, which reaches 3,000 residents on the island and approximately 1,000 residents off-island. In addition, approximately 2,500 copies were distributed to libraries, civic buildings, businesses, churches, museums, universities, communities, dignitaries and elected officials. The newsletter was also placed on the park's website to reach a wider audience.

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

## PUBLIC SCOPING MEETINGS

On April 2, 2003, the National Park Service hosted an afternoon and evening public scoping workshop at the Mullis Senior Center in Friday Harbor, Washington.

On the evening of April 3, 2003, the NPS held another meeting at the Recreational Equipment Inc. (REI) building in downtown Seattle. Presentations were made about the National Park Service, the historic significance of the camps, an overview of current site conditions, and the planning process. Small group work sessions allowed people to present and discuss issues, experiences, and ideas for the park. Approximately thirty-nine people attended the San Juan Island workshops in Friday Harbor, with another four attending the workshop in Seattle.

Eighteen written responses were collected. These included letters, e-mails, and newsletter questionnaires that were filled out and submitted. While most letters came from the local community in Friday Harbor and San Juan Island, several responses were received from nearby Anacortes, Seattle, Issaquah, Olga, Washington, and from El Paso, Texas. Overall, a total of 224 oral and written comments were received.

In addition to formal public scoping meetings, members of the planning team met with the following agencies and organizations during the public scoping period:

- Friends of the San Juans, Executive Director
- Roche Harbor Resort, Manager
- San Juan County Land Bank, Executive Director
- San Juan County Planning Department, Planning Director
- San Juan County Public Works Department, Director
- San Juan Preservation Trust, Executive Director
- Town of Friday Harbor, Land Use Administrator
- University of Washington, Friday Harbor Labs, Research Scientist

## SUMMARY OF SCOPING COMMENTS

A second newsletter was produced and mailed to the public in November 2003 with the same distribution (both mail and website) as the first newsletter. The purpose of this newsletter was to summarize the written and verbal comments received during the scoping period. The NPS received input from a diverse group of people including former park historians, community leaders, American Indian groups, and San Juan Island residents and organizations from the surrounding San Juan County community.

The comments covered a broad range of issues, concerns, personal experiences and recommendations for the park. When compiled, over 224 different comments or ideas were represented. These comments were used in developing the alternatives for the GMP. Though many new actions and ideas were suggested by the public during the public comment period, only one new issue on intertidal areas was added at this time by the planning team. They can be broadly organized in the following four topics: resource preservation and management; visitor experience and services; park facilities, operations, management, and maintenance; and park administration and planning.

### Resource Preservation and Management

The public commented on NPS management of cultural and natural resources such as the monitoring of sites of archaeological significance, preservation activities on historic buildings and features, museum/artifact collection management, control of invasive vegetation, forest health, water quality, coordination of research and youth services projects, and ensuring compliance with laws enacted to preserve the park's natural and cultural resources.



*Gathering input at a public scoping meeting. NPS Photo.*

- Many commenters emphasized the importance of protecting the natural and cultural resources in American and English camps. The public was especially concerned with the preservation of the diverse landscapes and habitats in the park through various means of management and protection.
- A few people emphasized the need for resource protection from park operations and visitor activity. They believed that recreational activity on park property should remain “low key and low impact.” The high quality of natural habitat on the island was mentioned as valuable and should be spotlighted in the GMP.
- Use of prescribed fire to protect the Garry oak landscape was encouraged and could be used to interpret the Native American story. Other cultural resources associated with American Indians should be protected.
- The protection of shoreline ecological areas was a large concern for many commenters.
- The protection of viewsheds and the “scenic assets” on NPS property was a concern expressed by many.
- The preservation of the Crook house was emphasized by several commenters. They were concerned that, with the dissolution of the Crook Historical Society, the house would not be protected as part of the encampment/military period story.
- The retention and display of artifacts found in the camps was recommended by many. Along with this recommendation, commenters also mentioned the need for a better display of artifacts at one of the camps or at the park unit's Friday Harbor headquarters office.
- The preservation and rehabilitation of historic structures was encouraged by a few. Others expressed interest in interior rehabilitation within historic structures such as the officers' quarters.
- Many commenters were supportive of some means to commemorate the historic military road that once connected the two camps. While they all recognized the difficulties in reconstructing an actual route, many felt that the significance of the road should be included in interpretive programs and potentially include historic markers or waysides along the route.

## Visitor Experience and Services

The following comments include staff and volunteers' provision of on and off-site interpretive/educational programs, publications and exhibits, special events, visitor center operations, public safety patrols, emergency response, and special use permits.

- Many commenters were concerned about the recent trend of privatization within the National Park Service and did not want to see their access to the park compromised. Many commenters were specifically concerned about being charged a fee to visit the park.
- Commenters wanted to see “pockets of learning” throughout the park, including information focusing on the natural and cultural history of English and American camps rather than recreation.
- The public wanted to see the connection between the natural and cultural resources in the park emphasized in the interpretive programs. A commenter stated that “historic connections lead to natural connections” throughout the island and that these connections should be interpreted.
- Many also wanted the interpretive program of the park to be expanded to include American Indian history and cultural practices, which would add some “historic realism and interpretive balance” to park programs. If the NPS chose to use the “historic period” of the encampment as a base for preservation, many suggested that a broader historic period be considered, highlighting the change over time on San Juan Island. Additionally, commenters wanted interpretation to educate the public on the geology and ecology of the park.
- A few commenters expressed their desire to see the NPS presence in Friday Harbor maintained, and to some degree, expanded, to help orient visitors to the island. They wanted a larger, more pedestrian friendly office, which was more visible and provided more services than are present now. Artifact displays and other exhibits were encouraged. One commenter suggested something as simple as moving the receptionist to the front of the office, which would greatly improve visibility. Other commenters suggested an alternative to locate administrative offices at the camps. Others suggested establishing offices with other organizations, such as the historical museum, county agencies, and Washington State Department of Transportation, in Friday

Harbor would be ideal.

- Another commenter suggested more energetic interpretation of park resources. They felt that the historical reenactments were a great idea and should be continued.
- Several commenters suggested an increased level of interpretive signage be included in the park. They wanted to know the simple, little details, such as where the pig was killed that started the tension between the United States and Great Britain or the exact location of Jakles Lagoon.
- Suggestions for off-site interpretive efforts focused on the development of partnerships with local businesses and organizations. Bed and Breakfasts, Suzie’s Mopeds, and Elderhostels were a few mentioned as potential areas to focus efforts.
- A few commenters were concerned about visitor safety. Traffic control along Cattle Point Road, the removal of creosoted timber from the coastal areas, glass, and other litter, and the occurrence of red tide in the summer were a few of the concerns mentioned.

## Park Facilities, Operations, Management, and Maintenance

The following comments include preventive and routine maintenance on historic structures, historic/cultural landscapes, and a wide array of support facilities and infrastructure, including a water treatment plant, a network of trails, park roads, picnic areas, and grounds.

- Many commenters were concerned with trail use and potential trail connections to other recreation areas on San Juan Island. Access from Roche Harbor, Cattle Point and Young Hill were emphasized. Suggestions for trail locations focused on the protection of natural and cultural resources from trail use and the separation of vehicular and pedestrian traffic where possible.
- Many commenters wanted the NPS to recognize the open space on park property in relation to the total amount of recreation and open space on San Juan Island as a whole. A few commenters wanted to see a balance between providing public access and resource protection. They felt that the provision of recreation activities on NPS property protected other sensitive areas on the island by limiting recreational activity there.

- Resource degradation through visitor activities, such as the removal of driftwood and artifacts, was a major concern expressed by many commenters. While they valued the recreational activities afforded them at the park, they also saw the value in the diverse natural and cultural resources at the camps. They felt that the park property provided island residents with a “sense of place” and needed to be protected.
- Enforcement of regulations and activities was also a concern. Clamming along coastal areas, the disturbance of archaeological sites, and other undesired visitor activities were discouraged. Monitoring unwanted activities and environmental degradation, as well as the development of protective regulations through federal, state, or county agencies, was encouraged as a long-term solution for resource protection. While many emphasized this point, a few respondents wanted to maintain the opportunity to beachcomb and collect driftwood.
- If new facilities were to be provided, these should not impact the natural and cultural resources, viewsheds, and ecologically sensitive areas of the park.
- Management of exotic flora and fauna, especially in marine and tidal areas, was suggested. It was suggested that foxes, rabbits, and invasive species of marine plants be removed. Additionally, the survey and protection of endangered or threatened species was encouraged.
- Another concern expressed by commenters was the level of accessibility to park property by the elderly and disabled. While some felt new parking areas were needed, others felt that a higher level of construction was not preferable. Several commenters suggested the need for an Americans with Disabilities Act (ADA) accessible trail to the parade ground from the current English Camp parking lot.
- The provision of mass transit and the exploration of non-motorized means of moving visitors around the island were encouraged.
- Several commenters said that they would like to see the NPS acquire the Mitchell Hill property managed by DNR, to protect resources associated with English Camp. Additionally, commenters expressed support

for the NPS to explore options of acquiring the DNR land near American Camp.

## Park Administration and Planning

The following comments include the general oversight of all park operations, including resource management, visitor and resource protection, interpretation, maintenance, partnership development, long-range planning, external programs, and community relations.

- Partnerships for stewardship with various state and county agencies were encouraged. Trails groups, San Juan County and state land management agencies, and Native American tribes from the area were enthusiastic about an increased level of participation in the park’s planning process. The creation of a “Friends” group for the park was encouraged by a few commenters.
- Increased opportunities for partnerships with Parks Canada were mentioned.
- Commenters encouraged the inclusion of the public in the planning process.
- A few commenters were concerned about the need to continue access to Cattle Point after Cattle Point Road is realigned.
- Additional concerns regarding funding for resource protection and park operations were expressed by several respondents.

## 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 San Juan Island National Historical Park were informed of the planning effort and encouraged to participate. The planning team also made several presentations at key stakeholder group meetings, as well as provided information through newsletter mailings and personal calls. Congressional officials were kept updated by newsletter mailings and informal briefings. These letters are on file.

### Section 106 Compliance

#### Consultation with Native American Tribes

In keeping with the provisions of Section 106 of the National Historic Preservation Act, Native American tribes within the vicinity of the park were contacted. During public scoping the Jamestown S'Klallam Tribal Council (Sequim, Washington), the Lower Elwha Tribe (Port Angeles, Washington), the Lummi Indian Tribe (Bellingham, Washington), the Port Gamble S'Klallam Tribe, (Kingston, Washington), the Samish Indian Nation (Anacortes, Washington), and the Swinomish Indian Tribe (LaConner, Washington) were informed about the initiation of the GMP. Subsequently, tribal staff met with the NPS regional anthropologist and the park superintendent 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. The NPS initiated consultation with the Washington State SHPO and the Advisory Council for Section 106 of the National Historic Preservation Act, as amended, in January 2003 during the public scoping period. During the release of the draft GMP/EIS, the NPS sent

individual letters to the SHPO and Advisory Council along with a copy of the draft GMP/EIS and summary newsletter on January 14, 2008. Copies of these letters are on file.

### 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 park was initiated in January 2003 and updated in May 2007. (See Special Status Species in the Affected Environment.)

#### Consultation with Washington State Natural Resource Agencies

In addition to federal consultation, 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 and again in May 2007 for species information for the park. This information was used in conjunction with the USFWS species information.

#### Consultation with Washington State Coastal Zone Management Program

According to NOAA and Washington State Department of Ecology, the National Park Service does not need to consult with the Washington State Coastal Zone Management Program for determination of federal consistency. "Washington State's Coastal Zone Management program excludes lands the federal government owns, holds in trust, or otherwise has sole discretion to determine their use. These "excluded federal lands" include all lands within National Parks, including private inholdings." (Washington State Department of Ecology, 2001).

# DISTRIBUTION OF THE DRAFT GMP/EIS

On January 14, 2008, the NPS mailed 315 copies of the draft GMP/EIS to agencies, governmental representatives, organizations, and interested individuals. Copies of the draft GMP/EIS were placed in the Friday Harbor and Anacortes public libraries for public review. The draft GMP/EIS was also placed on the park's Planning, Environment, and Public Comment (PEPC) webpage, allowing people to access the document and comment electronically. Information about how to reach the PEPC website was provided on the park's webpage and in the newsletter mentioned below.

A Notice of Availability was published in the Federal Register on January 18 (Volume 73, Number 13, Page 3464) noting the release of the draft GMP/EIS for public review. All comments received through March 24, 2008 were included in the official record.

San Juan Island National Historical Park sent out press releases to nine news outlets. Four newspapers—the Journal of the San Juan Islands, the Anacortes American, the Skagit Valley Herald, and the Bellingham Herald—placed advances in their papers and their online websites announcing the locations, times, and dates for the public workshops. The San Juan Islander, an online newspaper, also announced the public workshops.

In addition to the press releases, copies of the draft GMP/EIS were mailed to the following media: Journal of the San Juan Islands, the San Juan Islander, Bellingham Herald, Skagit Valley Herald, Anacortes American, The Argus, KGMI 790 Radio, KBRC radio, and KLKI Radio.

Copies of the draft GMP/EIS were mailed to the following tribes and tribal affiliations: Jamestown S'Klallam Tribe, Jamestown S'Klallam Tribal Council, Port Gamble S'Klallam Tribe, Swinomish Indian Tribal Community, Samish Indian Nation, Lummi Indian Tribe, Lummi Cultural Department, Lummi Indian Business Council, Lummi Indian National Tribal Historic Preservation Office, and the Lower Elwha Tribal Community Council.

In addition, copies of the draft GMP/EIS were sent to adjacent land managing agencies/organizations: the Bureau of Land Management in Wenatchee,

Washington, the Bureau of Land Management District Office in Spokane, Washington, the Washington Department of Natural Resources' Northwest Region in Sedro-Woolley, Washington and the San Juan County Land Bank in Friday Harbor, Washington.

A total of 2,000 newsletters were printed containing a summary of the draft GMP noting the public meetings and how individuals could obtain a full copy of the draft GMP/EIS. Each newsletter included a postage-paid return form for public comments and information about how to comment electronically via the PEPC website. Newsletters were distributed to libraries, civic buildings, businesses, churches, museums, universities, communities, nonprofit organizations, and elected officials. The newsletter was also placed on the park's website and on the Planning, Environment, and Public Comment (PEPC) website. An electronic public comment form was provided through this website.

## Public Meetings on Draft GMP/EIS

The NPS planning team held three open houses. The purpose of the meetings was to provide an opportunity for the public to meet with the NPS planning team to discuss the draft GMP/EIS, clarify information, ask questions, and provide comments.

One evening meeting was held in Anacortes at the Anacortes Library Community Meeting Room on February 6, 2008. Three people attended the meeting. Two public meetings, during the afternoon and evening, were held in Friday Harbor on San Juan Island on February 7 at the Mullis Senior Center. Though only 49 signed in, there were approximately 75 in attendance for the afternoon session. Seventeen participants signed in for the evening meeting. One-hundred and nine comments were recorded during the three meetings.

## Written Comments and Responses

At the close of the public comment period, the NPS received a total of 30 pieces of written correspondence, including letters from agencies, organizations and individuals; "return forms" from the draft summary newsletter; entries to the PEPC website, and emails to the park.

The letters received originated primarily from the San Juan Islands with six coming from other addresses in Washington State and one from Idaho. The following agencies and organizations commented on the draft GMP/EIS:

- Environmental Protection Agency
- Bureau of Land Management
- Samish Indian Nation
- San Juan Islands Conservation District
- San Juan County Marine Resources Committee
- San Juan County Council
- Friends of the San Juans
- National Parks Conservation Association
- The Conservation Fund
- The Whale Museum
- San Juan Island Trails Committee
- San Juan Island Trail Riding Club

The Environmental Protection Agency published a summary of agency comments in the Federal Register on April 18, 2008 (Volume 73, Number 76, page 21124), pursuant to the Environmental Review Process, under section 309 of the Clean Air Act and Section 102(2)(c) of the National Environmental Policy Act as amended. The EPA expressed environmental concerns about impacts to air and water quality, and requested additional data on current water and air quality within the park and mitigation for air and water quality impacts. EPA rating for the plan was EC2, Environmental Concerns for Insufficient Information. The Final GMP/EIS has been updated with additional information to address EPA concerns. Agency letters have also been reproduced in the final GMP and follow the “Public Comment and Response” section.

## 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 GMP/EIS. Comments were grouped into eleven broad categories, and of those categories, four major areas of emphasis emerged from the comments.

### Alternatives:

- All of the comments that expressed preference for one of the alternatives presented supported the NPS preferred alternative and the future vision for the park.

- Comments expressed support for focusing on the interconnectedness of the cultural and natural resources in preserving the historic setting of the park.
- A few comments expressed concern about specific elements in other alternatives of the plan, such as the visitor center in a new location at American Camp or the loop road concept at English Camp, as part of their support for the preferred alternative.

### Resource Preservation:

- Most comments supported continuing both cultural and natural resource preservation at the park and regarded the focus on resource preservation as a primary park purpose.
- Specific areas people expressed their support for included additional access to cultural resources (buildings, collections); repatriation of historic structures; prairie restoration and preserving Garry oaks; and greater involvement in marine resource stewardship.
- A few comments questioned the feasibility of prairie restoration and expressed concern about the impacts of resource management programs to both flora and fauna.

### Visitor Experience:

- Comments expressed substantial support for expanding opportunities for interpretation and education at the park, and many comments provided suggestions for new interpretive displays or programs.
- Comments also expressed substantial support for expanding trail connections and providing additional trails, including converting the Redoubt Road to a trail.
- Several comments also expressed support for replacing the visitor center at American Camp in existing location while a few concerns were expressed about impacts from improving or expanding parking in the park.

### Land Protection/Boundary:

- Overwhelming support was expressed for the inclusion of Mitchell Hill in the park boundary at English Camp.
- Many comments indicated questions and/or recommendations about proposed future uses of Mitchell Hill once it is included in the park boundary.

- Additional support for American Camp boundary expansion was also expressed in comments.
- A few questions about NPS rationale for the American Camp addition arose, however most questions about boundary adjustments related to proposed future use of the area.

## **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 Responses to Comments**

The section that follows contains comments which contain substantive points regarding information contained in the draft GMP/EIS or comments that need clarification. Comments and their responses are organized by topic heading and a concern statement that summarizes the issue to help guide the reader. In most cases, an individual comment is followed by a direct response. For subjects that received more than one substantive comment, 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.

# Public Comments and Responses

## Consultation

*Comments request additional information regarding consultation with tribes.*

**Comment:** We recommend that the final GMP/EIS include a discussion about the consultations NPS has had with Tribes potentially impacted by the proposed action, their outcomes, and a discussion of how issues raised in the consultations with Tribes were addressed.

**Response:** Consultation with tribes is required by the National Historic Preservation Act Section 106 and is interwoven with the National Environmental Policy Act consultation requirements as part of the NPS general management planning process. There are ten tribes and/or tribal affiliations included on the park's GMP mailing list. The tribes include the following: Jamestown S'Klallam Tribe, Port Gamble S'Klallam Tribe, Swinomish Indian Tribe, Samish Indian Nation, Lummi Indian Tribe, and the Lower Elwha Tribal Community Council. The Lummi Indian Nation is the tribe most clearly associated with San Juan Island.

On January 22, 2003, a letter was sent to the Chair of the Lummi Indian Business Council in Bellingham by the NPS Pacific West Region Chief of Planning to invite the tribe's participation in the GMP planning process. Enclosed with this letter was a draft project agreement for the GMP. In addition, an email dated March 13, 2003 was sent from the NPS Anthropologist personally inviting the Cultural Resource Manager Advisor from the Lummi Indian Nation to the April public scoping meetings.

In March 2003, during public scoping for the GMP, a scoping newsletter was prepared and mailed to everyone on the park's GMP mailing list, including the tribes. The purpose of the newsletter was to encourage participation and comment on critical park issues that needed to be addressed in the plan. It also provided relevant information about the park, purpose of the GMP, schedule of the planning steps and location, times, and dates of the public meetings. During scoping, the planning team received a letter by the Director, Center for the Study of Coast Salish Environments with the Samish Indian Nation in Anacortes on April 25, 2003. The letter focused on interpretation, preservation of natural and cultural resources, and collaboration and partnerships. These scoping comments were helpful in formulating the draft GMP.

In November 2003, a second newsletter was produced by the planning team and mailed to the GMP's mailing list summarizing the written and verbal comments received during the scoping period.

For several years (including the period of GMP development) the park Superintendent and the NPS Regional Anthropologist have been working with affiliated tribes on Native American Graves Protection and Repatriation Act (NAGPRA) issues on an ongoing basis. Inventories are now complete and notices are pending in the Federal Register. In addition, consultation has occurred with the tribes on the Cattle Point Road EIS, a road relocation project being planned in the park that is being addressed in a separate compliance action. A cultural resources assessment was done for the road's area of potential effect and was published in December, 2004. That study was shared with the tribes and comments were requested from them. The park and the Lummi are working closely together on plans to rebury ancestral remains from eroding sites within the park. In December, 2007, four representatives of the Lummi visited the park and toured sites of mutual interest. These projects and others have given park staff opportunities to keep the tribes apprised on issues and aspects of the general management plan in addition to official notices and to identify areas of mutual cooperation.

On January 14, 2008, the draft GMP was mailed to everyone on the park's mailing list. This included a summary newsletter of the draft GMP and either a CD or a paper copy of the draft

GMP. During the public comment period the Cultural Resources Program Manager for the Samish Indian Nation sent a letter dated March 14, 2008. In the letter, the manager requested continued information on the development of the draft GMP/EIS and any management plans and resource stewardship and archaeological research strategies that would be developed under the alternatives. The letter also mentioned that the tribe looks forward to continue to work with the NPS in the future.

*Comments question the consultation done with respect to the parcels at American Camp.*

**Comment:** The NPS has done an excellent job of contacting and interacting with groups and individuals supportive of their acquisition of the Mitchell Hill property (which I also support). Why didn't the NPS pursue with diligence their contacts with interested individuals, groups, and government agencies about their desire to acquire lands on the south end of the island? The inclusion of the proposed acquisition of properties at Cattle Point by NPS in the Draft Management Plan was a surprise to a lot of people.

**Response:** The National Parks and Recreation Act (1978) requires the NPS to include an examination of possible modifications to the existing boundaries of a park. The planning team informed the public early in the planning process that the team would be looking at boundary issues at both American and English camps. The topic of boundary was mentioned in the March 2003 scoping newsletter as one of the issues identified by the planning team to address in the GMP. The newsletter also mentioned that the public lands surrounding American and English camps have strong historic, ecological and spatial relationships with the park and the potential for cooperative management would be revisited with adjacent public land managers. This newsletter was sent to everyone on the park's mailing list, placed as an insert into the Journal of the San Juan Islands, and additional copies hand-distributed throughout the community.

The planning team met with individual agencies and organizations during public scoping and the adequacy of the boundary was mentioned as an issue that the park would need to consider. The issue was again discussed at the public scoping meetings in April 2003 and during the release of the draft GMP in February of this year. In addition, the park Superintendent and the Chief of the Pacific West Region Lands Program Center met with representatives of the Department of Natural Resources several times during the GMP planning process. The Superintendent also had discussions with the San Juan County Land Bank. The NPS will strive to maintain a collaborative relationship with all the land owners within the revised park boundary. A willing seller policy will be strictly followed.

Because the DNR is divesting itself of School Trust lands in San Juan County, there is a real possibility that Mitchell Hill could be sold and converted to non-conservation uses. That threat has made protection of Mitchell Hill a high priority for the National Park Service and the local community, and has generated much discussion and press coverage. The lack of an immediate threat to the lands proposed to be included inside the American Camp boundary may explain why it has been less discussed in the media.

**Comment:** Has the NPS contacted the two water district boards?

**Response:** Though not contacted personally, the president of the Cattle Point Water District is on the park's GMP mailing list and was mailed a copy of the draft GMP. A number of other residents of the two water districts (some of whom are current or past board members) are also on the mailing list and participated in public comment meetings.

## Cultural Resources

*Comments express concern about the public availability of cultural resources compromising their preservation.*

**Comment:** Chapter 5, the Affected Environment, describes the increased availability of the San Juan Island National Historical Park archival and material cultural collections. Some of the options described in this chapter will benefit the general public, students, researchers, other agencies and those individuals with a cultural connection to the area or objects. It may be beneficial to make certain parts of the archival and material cultural collections available to the public online or at various Park or collections management locations. Other options being considered may lead to adverse effects to cultural resources and are of concern. We are specifically concerned with the uncensored release of information contained in portions of the field notes, and reports and surveys of the archaeological sites as well as releasing maps and other locational information. Enhanced information availability will be a valuable resource, but should only be done if cultural resources will not be at risk. . .

Allowing the Parks museum collections to be available for research, interpretation and education will be a valuable resource and may enhance the visitor experience, scientific endeavors and sense of cultural connection to individuals, however, we are concerned with the collections being available to the public as stated in several areas of the Draft GMP/ EIS. This action may hinder the preservation of the collections by taking them out of a controlled environment as well as possibly allowing access to fragile or culturally sensitive materials.

**Response:** Thank you for commenting on this important subject. The NPS is responsible for implementing related federal laws and management policies that guide the agency in the protection of sensitive resources and sites. This information will be kept confidential to the extent permitted by law. The NPS would continue to work with tribes regarding information considered sensitive and confidential.

The following sentence will be added to p. 113 as a second sentence under Technology Options for Collection Availability:

“It is the intent of the park to explore options for making natural and cultural resource collections available on the internet for researchers and the interested public. However, in keeping with the Archaeological Resources Protection Act (16 U.S.C 470hh [a]) and the National Historic Preservation Act (16 U.S.C. 470w-3) information on the location, character or ownership of historic resources will not be disclosed if disclosure may (1) cause a significant invasion of privacy, (2) risk harm to the historic resource, or (3) impede the use of a traditional religious site by practitioners.”

## Land Protection/Boundary

*Comments question the rationale for the boundary expansion at American Camp.*

**Comment:** Why are properties at Cattle Point Water District (parcel 2) being considered? There are two water district operations located on parcel 2. Can the water districts retain rights and protections?

**Response:** The NPS is not proposing to acquire parcel 2. Alternative C, the Proposed Action, proposes that a conservation or scenic easement be developed in full cooperation with the water district to maintain forest cover and wildlife habitat on the property, under mutually agreeable terms. Actions proposed in this plan would not diminish the ability of the Water District to carry out activities.

**Comment:** I strongly object to the Park’s plans for annexation of these properties. There is an inherent conflict between the primary Park Purpose stated in the NPS Plan and the statutorily mandated purpose of the Cattle NRCA. The Cattle Point NRCA is a unique area containing a variety of ecosystems, and was established pursuant to Washington law for the primary purpose of natural resource conservation. RCW 79.71.020 sets forth the standards for natural resource conservation areas as follows: “Lands identified as having high priority for conservation, natural systems, wildlife, and low-impact public use values.” RCW 79.71.020 The statute goes on to define “low impact public use” to include: “...public recreation uses and improvements that do not adversely affect the resource values, are appropriate to the maintenance of the site in a relatively unmodified natural setting, and do not detract from long-term ecological processes.” RCW 79.71.030. The Cattle Point NRCA has, as its highest priority, conservation and preservation of natural systems and wildlife. Recreational use is secondary, and may only be “low-impact.” In contrast, the NPS Plan states that the primary purpose of San Juan Island National Historical Park to “preserve and interpret the sites of American and English camps and to commemorate the historic events associated with the final settlement and peaceful arbitration of the Oregon boundary dispute. Within these cultural landscapes, the park also protects natural resources and provides compatible recreational and education opportunities.” Clearly, while conservation may be a secondary goal of the NPS Plan, it is not the primary purpose. The NPS plan states that acquiring the Cattle Point NRCA will allow the NPS to better “interpret the park story” by having public trails that take the public to activities to those [historical] sites.” (pg 66). It fails, however, to list which, if any historical sites are contained in the Cattle Point NRCA. I am aware of none. The NPS Plan further states that, “while social trails now exist, the [current public agencies responsible for their management] have never established or maintained formal trails for public use on these properties.”

**Response:** The primary purposes of the Cattle Point NRCA are compatible with those stated in the Organic Act of 1916 that established the NPS, which are “to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” They are also compatible with other laws and regulations that guide management of the National Park System, so no major changes in management direction are expected. This GMP, which is rooted in national as well as park-specific legislation, emphasizes the importance of the natural resources in shaping the human history of the area and proposes a variety of protection and restoration activities for natural resources. In recent discussions between NPS, DNR, and BLM staff, it is clear that the agencies share a similar vision for these properties. Low-impact recreation is part of that shared vision. Changes to trails would be done, not to increase visitation or change its character, but rather to improve safety, make route finding easier, and enhance visitor understanding. From a cultural and interpretive perspective, the land that is now the Cattle Point NRCA was part of the original military reservation and played an important geographic role in the Pig War. One of the goals of including the NRCA within the park boundary is so visitors can walk and look at views similar to those seen by the soldiers of 1859 and learn about historic events from exhibits while looking at the actual landscape where they took place. Natural and historic waysides (though from a different time period) are already located on the NRCA, so this is not a departure from existing management.

**Comment:** Do not support the acquisition of three DNR tracts adjacent to the park. The DNR land at Cattle Point was given Natural Resources Conservation Area (NRCA) status many years ago mandated by the Washington State legislature. The primary goal is to maintain, enhance or restore ecological systems and habitat for threatened, endangered, sensitive plants and animals while providing opportunities for education and low-impact public use. The area, while important to islanders and visitors alike as a low-impact recreation area, has primarily been managed as a conservation area. DNR appears to be committed to keeping

that property. They currently have several projects in process there including habitat and natural resource assessment, wildlife monitoring including yearly surveys on the Island Marble butterfly, non-native plant control, partnerships in education and research, and the development of an interpretive center at the Cattle Point Interpretive Area. A bird checklist has been published for the NRCA, and inventories of plants, butterflies and mammals developed. All these factors speak to DNR's commitment to this property and to continuing to manage it. I do not feel this commitment by DNR was accurately or sufficiently reflected in the NPS Draft Management Plan section on preferred acquisitions.

**Response:** The DNR and BLM properties would be included within the revised NPS boundary as a result of this plan, but title would only change hands with the agreement of the current land managers and when the appropriate opportunity presents itself. The National Park Service would like to gratefully acknowledge the variety of activities undertaken by DNR and BLM employees, volunteer stewards, and neighbors over many years to protect and manage important resources at Cattle Point. Thank you for correctly pointing out that trailheads and interpretive exhibits do exist in some locations on the NRCA and that additional work has been done recently. The NPS would be pleased to collaborate with the other agencies on interpretive planning that would take a broader look yet incorporate work that the DNR and BLM have sponsored to date. Any trail or exhibit revisions would be based on goals that the NPS shares with the DNR and the BLM, which include visitor safety, good route finding/orientation, improved trail connections across property boundaries, enhanced visitor understanding and protecting resource values. A well designed trail should also reduce impacts to natural resources compared to a "social trail," meaning one that was started by repeated foot traffic, generally by visitors wishing to reach some desired feature by the shortest route. On Cattle Point and Mt. Finlayson, these informal trails are sometimes quite steep or are too close to the bluff edge. Some of these trails on NPS land are proposed for relocation and funding is programmed for the near future. A similar strategy could be used for collaborative projects. Language has been modified to reflect this.

**Comment:** The Cattle Point Interpretive Area and the Cattle Point Lighthouse are not exclusively relevant to American Camp and the Pig War history. The installations there at present emphasize and illustrate the early methods and systems for long distance communication on-shore and offshore. This is contemporary history to some people still living on San Juan Island. Its importance should not be diminished by the earlier events.

**Response:** The NPS administers the National Register of Historic Places. The power station and the lighthouse may be eligible for listing on the Register, so inclusion of those properties within the National Park system is consistent with the agency's mission and may attract additional resources for their protection. The NPS agrees that their importance should be acknowledged for their own stated historical purpose. The NPS would pursue nominations for any eligible properties, regardless of their relevance to the Pig War, and would interpret them appropriately.

*Comments request additional information about the status of easement agreements and land acquisition.*

**Comment:** As a resident of the Cattle Point Water District and a former Water District Commissioner, I have serious concerns about the NPS statement. The language of the NPS Plan is entirely unclear; what is meant by the term "less than fee title strategies?" Conservation easements? If so, what is the nature and extent of the conservation easements that NPS is seeking?

**Response:** The term "less than fee strategies" can mean conservation easements, but could also include cooperative management agreements between public agencies such as the DNR, BLM, NPS and San Juan County. In the case of parcel 2, the most likely strategy to pursue would be a conservation or scenic easement with the water district. Text in the GMP has been clarified to

read, “less-than-fee strategies, such as a conservation or scenic easement.”

**Comment:** We recommend the final GMP/EIS include information about the status of easement agreements and land acquisition, and show resulting alterations in park boundary locations, preferably with a map.

**Response:** To the best of the planning team’s knowledge, the park has not done any land acquisition or land negotiations for many years, other than a no-fee, 20-year lease from the DNR for the dock at English Camp in 2008. There are currently no inholdings in the park. There are no ongoing easement or acquisition negotiations that NPS staff are aware of, other than the new proposals specifically delineated in this document.

*Comments question the analysis of impacts related to the boundary expansion at American Camp.*

**Comment:** Moreover, the EIS prepared by the NPS in connection with the Plan is seriously flawed in that it fails to specifically address the increased impacts to the Cattle NRCA, but simply considers effects on natural resources in the Park as a whole, using either the entire park or the entire island as the area of consideration. The state of Washington has specifically designated the Cattle Point NRCA as an environmental site of “critical importance” to the people of the state, whose highest priority is for conservation. It contains unique and fragile habitats, including the only freshwater wetland (approximately 3 acres) on the south end of San Juan Island. Certainly the NPS has an obligation to conduct more than a cursory review of impacts from its planned (and vaguely described) trail “improvements” before changing the status of this property from a conservation area to one that is used primarily for interpretive purposes and increased recreational use.

**Response:** The NPS agrees that the NRCA contains unique and fragile habitats. In part because of its uniqueness, the natural resources of the NRCA have been well inventoried by state and federal agencies. Inventories of rare plants, wetlands, terrestrial ecosystems, and threatened and endangered wildlife were used as part of this EIS. Changes to trails and interpretive media in the NRCA as a result of this plan, because they are known only in a general sense, are assessed here in a general sense. Impacts are expected to be minor. Additional environmental compliance will be performed once the specifics of those proposals are known.

## Natural Resources

*Comments question the feasibility of prairie restoration in the park, the impacts of rabbits and exotic species, and the science supporting the proposal.*

**Comment:** **Vegetation:** Do not support restoring the entire SJINHP to a prairie state as existed during the Pig War era. It is too ambitious and expensive a project. I do support restoring certain sections of the prairie to its former state to illustrate how the landscape looked during the Pig War era. The NPS is doing a fine job of that now with the restoration activities that are on-going near the Redoubt. I support continuing with prairie restoration in the area of the Redoubt, down to South Beach, over to Pickett’s Lane, and back to Cattle Point Road with some exceptions. I do not support the total eradication of non-native plants in that area. Elimination of some non-native vegetation does seem reasonable, but if you change the character of the entire prairie ecosystem at American Camp by eliminating all the non-native vegetation, how are the current species of wildlife utilizing the area supposed to adapt to that change? The Draft Management Plan reports that there will be no significant negative long-term effects to wildlife in the area. What about the short-term effects? And if certain species of birds, especially, can not adapt in the short-term changes, i.e. eradication of certain vegetation that is crucial to their survival, then there will be no long-term for them.

**Response:** Complete eradication of non-native plants at San Juan Island National Historical Park is unlikely and is not the NPS's goal. Similarly, the NPS's goal is not to restore prairie to a state that existed during the Pig War era. Rather, the NPS's goal at the park is to restore a prairie community dominated by native grasses and forbs that support functions and values of native habitat, including provision of habitat for native wildlife and rare species, such as Townsend's vole and golden paintbrush. The NPS understands experimental restoration undertaken so far at American Camp would not be cost effective at larger scales. However, restoration activities completed to date have provided baseline information essential for efficiently restoring larger areas using integrated preparation techniques (such as prescribed fire and weed control) and direct seeding of native vegetation. Native wildlife at the park are adapted and have evolved to flourish in areas dominated by native vegetation. Large areas proposed for restoration, including nearly 200 acres dominated by non-native rabbits, currently provide minimal habitat for native wildlife, including small mammals, birds and the rare island marble butterfly. As described in the GMP/EIS, the NPS's plans to restore functional habitat throughout the park, including areas dominated by non-native rabbits, would provide long-term benefits to native vegetation and wildlife, including birds, as well as short-term benefits, by increasing food and cover and decreasing erosion of native prairie soils.

**Comment:** Eradication of European rabbits will reduce the food source of birds of prey including bald eagles and golden eagles. The rabbit issue is certainly a volatile one with island residents. Clearly their presence at American Camp has caused substantial destruction of prime prairie habitat. The NPS has made it clear they will be going ahead with this eradication. I think the NPS needs to do a far better job of explaining to islanders why this is necessary. It is a potential public relations nightmare.

**Response:** The NPS appreciates the commenter's concern regarding public perception of activities undertaken at the national historical park. Issues and problems associated with non-native rabbits are discussed in the GMP/EIS and the final GMP/EIS will serve as the foundation and guide for future activities at the park. Before larger scale actions are undertaken by the NPS to restore prairie or control non-native rabbits at American Camp, the NPS will complete further planning and compliance. This future planning effort will entail at least one public meeting and release of a draft restoration plan, which the NPS will make available widely for public comment. The detailed restoration plan will document in detail the purpose and need for the project, describe alternative options for meeting project objectives, and evaluate environmental effects associated with each of the considered alternatives.

**Comment:** The vision is far-reaching and exacting in its desire to depict a landscape and culture from 150 years ago. That is an admirable goal in theory, but is it feasible, and are the goals of prairie restoration consistent with a naturally changing landscape and wildlife populations?

**Response:** Most of the changes in the landscape and wildlife populations at the national historical park are not natural but have resulted from relatively recent human use and alterations. Although Native Americans undoubtedly influenced natural communities in the islands, it was not until intensive farming began on the American Camp prairie that many native species were extirpated and species not native to the Pacific Northwest came to dominate the area's plant and animal assemblages. As described above in the previous response, the NPS's goal from a natural resources perspective is to restore a prairie community which is dominated by native grasses and forbs that support functions and values of native habitat, including provision of habitat for native wildlife and rare species. Restoration is also consistent with cultural resource goals for the landscape, which are to maintain historic structures, views, and other documented features of the historic landscape and to enhance visitor understanding of those features. The open prairie landscape that is a unique characteristic of American Camp has been greatly affected by invasive species. Trend evidence suggests that it could be lost entirely if the park does not pursue

restoration activities. Methods to restore native prairie have been developed and implemented at many sites over many decades throughout North America. Using standard, widely practiced techniques in association with site-specific information developed through research at this park, the NPS believes prairie restoration at American Camp is feasible and necessary to achieve the park's natural and cultural resource goals.

**Comment:** **What about long-term monitoring of the prairie restoration? Can the NPS truly restore the prairie?**

**Response:** The staff at San Juan Island National Historical Park is working in collaboration with the NPS's regional Inventory and Monitoring Network (<http://science.nature.nps.gov/im/units/nccn/index.cfm>) to complete and implement a protocol for long-term monitoring of prairie habitat at the park. Pilot data was collected in 2007 and 2008, and this data will form the baseline for monitoring and documenting future changes in the prairie at American Camp. As described above in responses to comments, restoration of prairie dominated by native species to meet NPS objectives is feasible and necessary to preserve and restore native plant and animal communities at SJINHP.

**Comment:** **The park staff needs to conduct an environmental analysis on the consequences on other animals before the removing the rabbits. For example, the eagles used to feed primarily on salmon which are declining and may now feed on the rabbits. There needs to be more research on this before removing the rabbits as a food source.**

**Response:** As described above in response to a previous comment, issues and problems associated with non-native rabbits are discussed in the GMP/EIS. The final GMP/EIS will serve as the foundation and guide for future activities at the park. Before larger scale actions are undertaken by the NPS to restore prairie or control non-native rabbits at American Camp, the NPS will complete further planning and compliance. This future planning effort will entail at least one public meeting and release of a draft restoration plan, which the NPS will make available widely for public comment. The detailed restoration plan will document in detail the purposes and need for the project, describe alternative options for meeting project objectives, and evaluate environmental effects associated with each of the considered alternatives. Although bald eagles feed primarily on fish and seabirds, they are opportunistic and also will feed on carrion, small mammals, and other creatures. As part of the project-specific restoration plan and impact analysis, the NPS will compile and present additional information to the public concerning feeding habits of bald eagles. Similar information will be included in the project-specific impact analysis concerning effects of the prairie-restoration project on other species of concern, such as the island marble butterfly. In addition, the NPS is planning to undertake a study this summer (2008) to investigate the effects that non-native rabbits may be exerting on native reptiles and small mammals at the park. The results of this study should be available to incorporate into the impact analysis for the prairie-restoration project.

**Comment:** **Do the rabbit warrens erode the soil as stated in the Draft GMP or actually aerate it by allowing water to percolate into the substrate? Have rabbits altered the soil profile by use so that there are no prairie soils anymore?**

**Response:** Non-native rabbits at American Camp inhabit historic prairies soils of the San Juan series, which cover approximately 535 acres – or nearly half – of the American Camp Unit. San Juan soils support a top layer approximately 19 inches deep of sand (45 – 75%), silt (15 – 15%), clay (2 – 12%) and organic matter (up to 12%) interwoven with a network of fine roots. Below the upper layer is about 20 inches of sandy soil that contains minimal silt, clay and organic matter and with physical properties similar to beach soils (for example, xerorthents). Below this sandy layer is a more compacted layer of sandy soil with larger cobbles. Rabbits burrow through the upper layer and appear to expand burrows horizontally in the mid-layer of uncompacted sandy

soil. Roots in the upper layer prevent topsoil from collapsing into the burrows, while cobbles and compacted soil at lower depths prevent rabbits from easily digging deeper. While excavating burrows, rabbits deposit sandy soil on top of historic prairie soils, resulting in surface patches with physical characteristics similar to beach sand. While the relatively small openings created by rabbits at burrow mouths undoubtedly permit a slight increase in water penetration to lower depths below the root zone, the larger areas of exposed sand increase potential for wind erosion. For instance, according to the Natural Resources Conservation Services's Wind Erodibility Index (WEI), it is expected that 86 tons of San Juan soil per acre may be lost to wind erosion each year (NRCS 2005). Conversely, the WEI for soils similar to those deposited on the surface by rabbits (for example, xerorthents) is 220 tons per acre, resulting in wind erosion of soils excavated by rabbits that is more than two times greater than erosion of soils that would occur under natural conditions. Similarly, San Juan soils are categorized as Wind Erodibility Group (WEG) 5, while soils similar to those excavated by rabbits are in WEG 1 with groups ranked on a scale of 1 to 8 with Group 1 soils most susceptible to wind erosion (NRCS 2005).

*Comments request additional information about the quality of drinking water and strategies the park would take to maintain water quality.*

**Comment:** Because of the potential for construction, operation and maintenance activities to impact groundwater, we recommend that NPS include information about the present quality of drinking water in the park, potential adverse effects that could result from activities, and measures that would be taken to protect drinking water in the park.

**Response:** The water systems at San Juan Island National Historical Park are monitored by a certified operator and properly disinfected. All drinking water construction projects are reviewed by the NPS office and reviewed/approved by the Washington Department of Health (DOH) Drinking water program. There are no new projects currently under development at this time, however when these projects are proposed the NPS will adhere to all applicable Federal/State drinking water regulations. The park currently works closely with the DOH since this is the primacy agency for drinking water systems. All water systems have been surveyed. There is one nonpublic water system (maintenance) on site and annual bacteriological sampling is performed on this site even though it is not required by the state (John Leffel, personal email communication, 2008).

The NPS also has a well head protection plan to ensure that no contamination will enter via the three park wells, minimizing any potential adverse effects from activities. The most recent survey indicated no hazards to the American Camp well, other than its proximity to the road. (John Leffel, personal email communication, 2008). The water quality section of the affected environment has been updated to include this information. In addition, the NPS will strive to implement the recommendations from the Assessment of Coastal Water Resources and Watershed Conditions as part of the Preferred Alternative. The Preferred Alternative under Coastal Water Resources and Hydrologic Systems has been updated to include the detailed recommendations from this plan.

**Comment:** The final GMP/EIS should include information about State water quality standards and clarify that individual projects would be designed to assure that applicable water quality standards would be met throughout the life of the projects. If waters in or near the park do not meet water quality standards and the Washington Department of Ecology (Ecology) has developed restoration plans for them, we recommend that the NPS coordinate with the Ecology as such plans are implemented. If plans to restore water quality have not yet been established for impaired waterbodies, then we recommend that the NPS coordinate with Ecology as the plan is developed. Also, the GMP/EIS should demonstrate that there will be no net degradation of water quality in waters where water quality standards are currently being met.

**Response:** The Washington Department of Health provided oversight to the NPS during the development of the well project and performed baseline tests to ensure that applicable water quality standards could be maintained. A Public Health Consultant and park staff routinely conduct tests to ensure the park is complying with the state of Washington Department of Health drinking water standards. Water samples are collected twice per month for bacterial analysis. The samples are collected mostly at points of discharge in the restrooms at the American Camp Visitor Center, the outside faucets, and the hookup-faucets at the Volunteer-in-Park (VIP) trailer hookups. American Camp is monitored year-round and English Camp is monitored when the area is in use and/or being prepared for use, typically May through October. Samples are sent to a private, state-approved facility for analysis and results are then sent to the park and Washington Department of Health offices. To date, all bacterial samples have been negative (Christopher Davis, personal email communication, 2008). The park also conducts an annual nitrate test, also required by Washington state water quality regulations. To date, the park has been in compliance with water quality standards for this criterion.

The NPS concurs that it would coordinate with the Washington Department of Ecology as it develops and implements restoration plans for impaired waterbodies that affect park resources. Two additional desired conditions have been added to the Final GMP/EIS to reflect the NPS commitment to maintaining or improving water quality and assuring that applicable water quality standards are met through the life of a project and also factored into park management decisions. Please see the Desired Conditions section for Coastal Water Resources and Hydrologic Conditions in the Final GMP/EIS.

**Comment:** Under the CWA, any construction project disturbing a land area of one or more acres requires a stormwater National Pollutant Discharge Elimination System (NPDES) permit. In keeping with NPS's intent to use sustainable design, we encourage use of Low Impact Development (LID) techniques that reduce the volume of stormwater and mimic natural conditions as closely as possible. For example, LID techniques would lessen the impacts of stormwater runoff from impervious surfaces such as paved parking lots, roads and roofs.

**Response:** The NPS is aware of permitting requirements for projects under a variety of laws, including the Clean Water Act. The NPS will seek all appropriate permits for projects that implement the recommendations of the GMP. The Final GMP has also been updated to include a desired condition statement for all alternatives that encourages the use of Low Impact Development (LID) techniques in order to lessen the impacts of stormwater runoff from impervious surfaces. Please see the Desired Conditions for Facilities in the Final GMP in Chapter 4.

*Comments request additional information and discussion on ambient air conditions and request additional actions to minimize impacts to air quality.*

**Comment:** We recommend that the final GMP/EIS provide additional discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), and criteria pollutant non-attainment areas in or near the park. The analysis of air quality should estimate emissions of pollutants, discuss the timeframe for release of these emissions and specify sources. The potential impacts to air quality (including cumulative and indirect impacts) from construction and operation activities should also be analyzed. We also recommend development of an Equipment Emissions Mitigation Plan that identifies actions to reduce diesel emissions, particulates, carbon monoxide, hydrocarbons, and NOx associated with construction activities on park land.

**Response:** Thank you for your comment. Additional information has been added to the Air Quality section of the Affected Environment in Chapter 5 regarding baseline ambient air conditions, NAAQS, and nonattainment areas in or near the park. In addition, NPS staff have included

estimated emissions of pollutants and specified source categories based on information from the Washington Department of Ecology. (Note that there are no industrial sources of air pollution in San Juan County.) Time frames for release of these emissions are not provided by Ecology but are apparent from the emission inventory (for example, woodstoves are used when weather is cold, recreational boating is predominately in the summertime, etc.). Actions for potential impacts including cumulative and indirect impacts from construction and operation activities are notes on pages 209, 212, and 215 of the draft GMP with the implicit understanding that further impact analysis will be done at the project level. An equipment emissions mitigation plan has been added on page 70 which identifies actions to reduce diesel emissions, particulates, carbon monoxide, hydrocarbons, and NOx associated with construction activities.

An equipment mitigation plan has also been provided in the Air Quality section of Chapter 5.

*Comments request additional information about carrying capacity actions the park may take if impacts are adverse and significant.*

**Comment:** EPA recommends that a summary of the workshop results be included in the final GMP/EIS along with a discussion of the impacts increased user capacity may cause to park resources. If the impacts are adverse and significant, then we recommend that the final GMP/EIS indicate how they will be minimized or mitigated.

**Response:** Thank you for your comments. The NPS has updated the User Capacity section under Alternative C, the Preferred Alternative, to include a summary of the user capacity workshop that developed the indicators and standards for the GMP. This section of the plan also provides a range of potential management actions that may be undertaken if standards are exceeded and impacts to resources become evident. The NPS has also provided a more detailed example of management actions that may be taken in response to the standard for social trails and impacts to resources such as the prairie. The park will develop a detailed monitoring plan, an implementation plan tiering off the GMP/EIS that provides additional detail on how indicators and standards will be monitored, modified if needed, as well as identify a range of management actions that could be taken if monitoring indicates that standards are being approached or exceeded. Please see the User Capacity section in the final GMP/EIS for this updated language.

*Comments request additional detail about nearshore resources and request they be treated separately from general “natural resources.”*

**Comment:** Nearshore Resources: The extensive shoreline and intertidal forage fish, eelgrass, marine riparian and shellfish resources of the Park are significant, and unique enough to warrant individual management consideration. We recommend the Park expand the natural resources table to designate a separate row that specifically addresses these habitats and species, instead of lumping them in the general ‘natural resources’ category. In addition, we recommend that the maps utilized to communicate the management zones and alternatives be updated to include forage fish spawning beaches and eelgrass beds.

**Response:** The NPS appreciates and agrees with the commenter’s concern for special recognition of the importance of nearshore habitat at the park. Accordingly, in the draft GMP/EIS, the NPS included specific information concerning nearshore habitats and coastal wetlands (pages 149–151) and has updated the natural resources maps, Figures 19 and 20 in the final GMP/EIS to indicate the distribution of eelgrass beds and forage fish spawning areas adjacent to the park.

*Comments question the use of local specialists.*

**Comment:** You stated in the plan, “All available information on wildlife populations was compiled.” I strongly disagree with that statement. While regional consultants were valuable resources,

opportunities were lost to consult with local biologists and naturalists who could have given park management valuable input into local species activities and vulnerabilities. The material you have presented on the acquisition of south end properties does not even remotely represent a thorough EIS of the area and its vulnerabilities to proposed increased public use.

**Response:** As described in the draft GMP/EIS, the NPS requested comments and information from the public and specific organizations at multiple times throughout the planning process. Hundreds of comments – most of them local but some from as far away as Texas – were received and utilized by the NPS while preparing the draft GMP/EIS. The NPS held multiple public meetings to solicit comments and expertise from interested parties, including a series of meetings held in April 2003 and a series of newsletters that were widely circulated on San Juan Island and throughout a broader geographical area. One newsletter was inserted into a weekly edition of the Journal of the San Juan Islands. Regular notices requesting public input, as well as updates on the status of the GMP/EIS, also were posted on the park’s website (<http://www.nps.gov/sajh>) and the NPS’s planning website (<http://planning.nps.gov>). In addition, as described in the draft GMP/EIS, the NPS met with representatives of numerous local organizations while developing the document, including Friends of the San Juans, research scientists at the University of Washington’s Friday Harbor Laboratories, San Juan Preservation Trust, San Juan County Land Bank, and many others. The NPS also solicited and received information from the Washington Department of Fish and Wildlife and the U.S. Fish and Wildlife Service.

## Research

*Comments request additional information on the goals of research plans.*

**Comment:** Under “Research,” all alternatives mention that a research plan will be developed in the future. Although a detailed research plan is of course beyond the scope of this document, we suggest including a summary of research goals and priorities. Even a general list of desired outcomes can help in grant writing and attracting outside scientists and graduate students. (Simple as it sounds, there is currency in being able to relate project proposals directly to the goals of a protected area’s management plan).

**Response:** San Juan Island National Historical Park currently lists research priorities, along with other NPS units, on the NPS’s Research Permit and Reporting website (<http://rprs.nps.gov/research/ac/parks/ParkInfo> - for park-specific information, search for ‘San Juan Island NHP on the scroll-down menu). The park also is collaborating with the NPS’s North Coast and Cascades Inventory and Monitoring Network (<http://science.nature.nps.gov/im/units/nccn/index.cfm>) to update the park’s Research Catalog and to distribute research priorities to the public. Research of particular interest at the park includes intertidal and shoreline ecology; forest and grassland ecology; landscape dynamics; insect biodiversity; soil productivity; distribution, abundance and ecological effects of non-native plants and animals; and effects of visitation and recreational use on natural areas.

## Visitor Experience

*Comments question the alternative language for equestrian use and propose new language to provide consistent detail with other recreational uses.*

**Representative Quote:** Under Recreation/Equestrian we would like to see the same language that is used regarding Bicycle Use under all Alternatives: “if additional land is required, partner with equestrian user groups to maintain multi-use trails and monitor proper use of trails.”

**Response:** The park Superintendent and staff recognize that parts of the park continue to be used by equestrian users. The final GMP has been updated to provide language for equestrian use of trails that is similar to bicycle use, and includes partnering with trail riding groups to maintain

horse trails and monitor use of trails. The planning team has added language to the final GMP to address equestrian use in both the Alternatives Chapter and the Environmental Consequences Chapter.

*Comments express concern about elements of alternatives other than the preferred alternative in the plan.*

**Comment:** Alternative B Boat Ramp: while the plan is unclear as to the details of the proposed new ‘constructed’ kayak and canoe landing in English Camp, it should be noted that the location is a documented year round surf smelt spawning site and that this proposed activity is likely inconsistent with protection of this spawning habitat.

**Response:** Thank you for your comment. The NPS has added language to the proposal for the kayak/canoe landing in Alternative B to clarify that the intent was for a very small landing for one to two boats, given the physical limits of the site. In addition, the NPS has updated the analysis in the wildlife section of the Environmental Consequences chapter for Alternatives B to include associated impacts from this proposal to adjacent surf smelt spawning habitat. The environmental impacts of this action were one of the primary reasons that the NPS did not include this kayak/canoe landing in the NPS Preferred Alternative, Alternative C.

**Comment:** Alternatives Band C both mention the reconfiguration and possible expansion of parking at South Beach. The existing parking area is located on sand flats, a rare habitat in San Juan County. Expanded parking should be avoided in this area, and any reconfiguration should avoid damage to the habitat. Parking alongside the entry road would have fewer ecological impacts. In general, we support parking plans that prioritize resource protection and the quality of the visitor experience, rather than demand.

**Response:** The NPS has added language to Alternative C to clarify that the proposed reconfiguration of parking at South Beach would occur within the existing disturbed zone created by the current parking area. While Alternative B does still propose a potential expansion of parking areas at both South Beach and Fourth of July Beach, the NPS does not include expansion of these parking areas in the Alternative C, the Preferred Alternative and Proposed Action. The NPS concurs that protection of sensitive ecological resources is a priority. The NPS has also updated the vegetation section in the Environmental Consequences chapter to include the impacts from these actions in Alternatives B and C.

*Comments request the NPS clarify the distinction between social trails and formal trails and explain the impacts*

**Comment:** The NPS fails to describe what is meant by “social trails” versus “formal trails” but implies that additional trails would be constructed in the Cattle Point NRCA, or that current trails would be improved as “formal trails,” e.g., enlarged, made accessible to handicapped, and/or used for additional recreational purposes such as bicycle trails, etc. However, any increased recreational use of existing trails the Cattle Point NRCA for the purpose of bringing an increased number of visitors to “historical sites” would have the inevitable result of increasing impact to the critical habitats contained in the Cattle Point NRCA. Such increased public usage would fail to meet the standard mandated by RCW 71.71020 that usage of the NRCA must be of a low-impact nature.

**Response:** The NPS defines a “social trail” as a trail created by visitors or an unofficial trail created by other entities and kept open by visitor use. Social trails may result from visitors seeking to reach locations not accessible by formal roads or trails; seeking shortcuts; and avoiding difficult sections, obstacles, or degradation on formal trails. Social trails often cut through sensitive

habitats.

Formal trails are those trails intentionally provided by NPS for the user and are marked or signed. Some of these trails can be made ADA accessible, but not always, depending upon available substitute trails and existing topography. These definitions have been added to the draft GMP glossary.

It is not the intent of the NPS to increase recreational use of the existing trails in the Cattle Point NRCA. As stated in Alternatives B and C the NPS would study existing recreational uses and develop a visitor use management plan for any new land parcels acquired, consistent with the recreational uses within the park. When the park boundary is extended to include the NRCA, management of that parcel would be done in cooperation with DNR land managers and consistent with its existing management and use.



# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
Spokane District  
Wenatchee Field Office  
915 Walla Walla Avenue  
Wenatchee, Washington 98801

IN REPLY REFER TO:  
1793 (134)

March 14, 2008

Peter Dederich, Superintendent  
San Juan Island National Historic Park  
650 Mullis Street, Suite 100  
Friday Harbor, Washington 98250

Dear Mr. Dederich:

Thank you for the opportunity to comment on the San Juan Island National Historic Park (NHP), draft General Management Plan and Environmental Impact Statement. We would like to congratulate the National Park Service Planning Team and your staff for a very complete analysis and plan. We must, however, express some concern that the Bureau of Land Management was not more formally consulted in drafting the alternatives.

Alternatives B & C both propose property boundary adjustments, which include acquisition of a 27 acre parcel of BLM land at Cattle Point. We understand that this property boundary adjustment allows the NHP greater flexibility to allocate funds and explore opportunities for cooperative management strategies. We must stop short of endorsing either of these alternatives until we have had a chance to meet with you and discuss these alternatives in more detail.

As your neighboring agency, we look forward to every opportunity for collaboration, sharing of resources, partnerships and cooperation. If you have any questions or you would like to discuss these matters in more detail, I can be reached at 509-665-2100.

Sincerely,

Donald Washco  
Acting Field Manager

# THE CONSERVATION FUND

March 20, 2008

Mr. Peter Dederich  
Superintendent  
San Juan Island National Historical Park  
National Park Service  
P.O. Box 429  
Friday Harbor, WA 98250

Dear Mr. Dederich:

On behalf of The Conservation Fund, I write to thank you for the opportunity to submit comments in support of the draft General Management Plan (GMP) and Environmental Impact Statement for the San Juan Island National Historical Park.

The Conservation Fund (TCF) is a national non-profit organization dedicated to conserving land and water for future generations through partnerships with federal, state and local agencies and organizations. We have been pleased to have the opportunity to work with the National Park Service (NPS) in the Pacific Northwest to conserve over 1,100 acres of historic lands at the Lewis and Clark National Historical Park in Pacific County, Washington and at Fort Clatsop in Oregon.

TCF appreciates NPS's leadership to conserve outstanding natural resources on San Juan Island and to expand educational and recreational opportunities to the public. TCF supports Alternative C, the NPS's preferred alternative, which recommends the acquisition of the 312 acre Mitchell Hill tract from the State of Washington Department of Natural Resources (DNR).

As the largest unprotected tract of land on San Juan Island, the 312 acre Mitchell Hill tract features outstanding natural, historical and recreational resources, including a segment of the 19<sup>th</sup> century military road that connected English Camp with American Camp. Located immediately adjacent to English Camp, the Mitchell Hill tract features important stands of Garry oak along with wildlife habitat along Young Hill and Cady Mountain.

In addition, Mitchell Hill's 2.9 mile trail network provides local residents and visitors with excellent opportunities for hiking, mountain biking, horseback riding and other outdoor recreation. Permanently conserving this tract is especially important to meet the needs of the Park's 250,000 annual visitors.

*Partners in land and water conservation*

Post Office Box 1524 • Sun Valley, ID 83353 • (208) 726-4419 • FAX (208) 726-4429



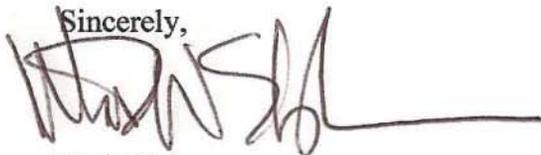
Mr. Peter Dederich  
March 20, 2008  
Page two

In conjunction with San Juan County, TCF is currently working with the Washington DNR to reach a multi-party exchange/purchase agreement to conserve this property as part of the Park, as recommended in Alternative C. We hope to reach an agreement this year to conserve the property in advance of the 2009 sesquicentennial of the Pig War of 1859 and the centennial of Friday Harbor's founding. In the event that the final GMP recommends the proposed boundary expansion, we understand that the NPS would have the authority to acquire the property, without additional authorizing legislation.

In addition to conserving Mitchell Hill's natural and historic resources and ensuring continued outdoor recreational opportunities, an agreement to acquire the Mitchell Hill would provide revenue to the State of Washington to support public education.

Thank you for this opportunity to comment. We look forward to working with you, local partners, and the National Park Service to conserve Mitchell Hill for current and future generations.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Mark Elsbree', with a long horizontal line extending to the right.

Mark Elsbree  
Vice President and Northwest Director

cc: San Juan County Council  
Lisa Nash Lawrence, Chair, San Juan County Land Bank Commission  
Mr. Lincoln Bormann, Executive Director, San Juan County Land Bank  
Doug Sutherland, Washington DNR  
The Honorable Patty Murray  
The Honorable Maria Cantwell  
The Honorable Rick Larsen



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

March 17, 2008

Reply To

Attn Of: ETPA-088

Ref.: 03-008-NPS

Peter Dederich, Superintendent  
San Juan Island National Historical Park  
P.O. Box 429  
Friday Harbor, WA 98250

Dear Mr. Dederich:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft General Management Plan (GMP) and Environmental Impact Statement (EIS) for **San Juan Island National Historical Park** (CEQ No. 20080014) in San Juan County, WA. Our review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we also evaluate the document's adequacy in meeting NEPA requirements.

The draft GMP/DEIS evaluates the impacts of a National Park Service (NPS) proposal to update a 1979 management plan for the park and respond to changed conditions within the park since then. This GMP/DEIS describes and analyzes the potential impacts from three alternative actions (A-C) proposing management strategies for resource protection and preservation, education and interpretation, visitor use and facilities, land protection and boundaries, long-term operations and management of the park. This GMP would last 15-20 years.

Under No Action Alternative (Alternative A), existing management strategies and trends at the Park would continue without change. Under Alternative B, the NPS would increase visitor opportunities and outreach through additional visitor facilities, recreational opportunities, programs, and services. Natural and cultural resources interpretation would be enhanced; the road system would be reconfigured to include existing historic road alignment where possible; the Crook house would be renovated; and at the American Camp, the 1979 double-wide trailer would be removed, the site restored to natural conditions, and a new enlarged visitor center would be built. The cultural landscapes would be enhanced to aid visitor understanding and interpretation through a variety of techniques. The prairie would be restored to native plant species.

The **Preferred Alternative** (Alternative C) would broaden the scope of resource management and interpretation programs to emphasize the connections and interrelationships between the park's natural and cultural resources. At English Camp, the Crook house would be stabilized and the hospital would be rehabilitated and opened to the public for interpretation.

The 1979 double-wide trailer would be replaced with a larger and permanent visitor center. A collections study room for natural and cultural resource items would also be relocated to the park. There would be more buildings open to the public for interpretation as well as research and academic studies. Off-island interpretation would be enhanced through partnerships. As in Alternative B, the existing road to the redoubt off Pickett's Lane would be converted to a trail and the prairie would be restored to native plant species. The NPS would also extend current park boundaries at English and American camps to include parcels now owned by Washington State, Bureau of Land Management (BLM), and private landowners.

The two action Alternatives (B and C) would result in varying degrees of effects to park resources, with most impacts being associated with proposed construction activities. Overall, however, the Preferred Alternative would afford park resources a higher degree of protection than Alternative B, especially after application of proposed mitigation measures to offset construction impacts. As a result, NPS believes that implementation of the Preferred Alternative would result in more beneficial than adverse impacts to park resources (p. 74-75).

As presented, the GMP/DEIS would serve as a good comprehensive planning framework that can be used as a basis and context for making decisions about more detailed resource and visitor use management actions. We also understand that detailed individual project plans will be subject to separate NEPA analysis and subsequent public review.

We are pleased that NPS plans to develop new facilities using sustainable designs to conserve resources. We also appreciate that climate change considerations were taken into account in the DEIS.

We support many of the proposed actions under the Preferred Alternative which are designed to develop desired conditions for protecting park resources and improve visitor usage. However, the final GMP/EIS would be improved if it included additional information as explained in our comments that follow.

### **Water resources**

Water quality degradation is one of EPA's primary concerns. Section 305(b) of the Clean Water Act (CWA) requires that the quality of all waterbodies be characterized, while section 303(d) of the same act requires each state to identify waterbodies that do not meet water quality standards. The GMP/EIS analysis should therefore disclose which waters may be impacted by the proposed action, the nature of potential impacts, and specific pollutants likely to impact those waters. It should also report those water bodies potentially affected by the project that are listed on the State's most current EPA approved 303(d) list. Antidegradation provisions of the CWA apply to those waterbodies where water quality standards are currently being met.

The GMP/DEIS indicates that drinking water at the park is drawn from wells located in the park and an outside source (p. 184). The 1996 amendments to the Safe Drinking Water Act (SDWA) require federal agencies to protect sources of drinking water for communities. Source water is untreated water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. Groundwater extraction, land disturbance, material storage, waste disposal, inadvertent chemical or hazardous liquid spills, and compaction produced by vehicular traffic can all affect recharge to the park aquifer and groundwater quality.

### *Recommendations*

The final GMP/EIS should include information about State water quality standards and clarify that individual projects would be designed to assure that applicable water quality standards would be met throughout the life of the projects. If waters in or near the park do not meet water quality standards and the Washington Department of Ecology (Ecology) has developed restoration plans for them, we recommend that the NPS coordinate with the Ecology as such plans are implemented. If plans to restore water quality have not yet been established for impaired waterbodies, then we recommend that the NPS coordinate with Ecology as the plan is developed. Also, the GMP/EIS should demonstrate that there will be no net degradation of water quality in waters where water quality standards are currently being met.

Under the CWA, any construction project disturbing a land area of one or more acres requires a stormwater National Pollutant Discharge Elimination System (NPDES) permit. In keeping with NPS's intent to use sustainable design, we encourage use of Low Impact Development (LID) techniques that reduce the volume of stormwater and mimic natural conditions as closely as possible. For example, LID techniques would lessen the impacts of stormwater runoff from impervious surfaces such as paved parking lots, roads and roofs.

Because of the potential for construction, operation and maintenance activities to impact groundwater, we recommend that NPS include information about the present quality of drinking water in the park, potential adverse effects that could result from activities, and measures that would be taken to protect drinking water in the park.

### **Air quality**

The GMP/DEIS indicates that air quality within the park is generally good and that the park has been designated Class II airshed. Air quality may be impacted in the short term due to construction of new and use of access roads, prescribed fire to manage cultural landscapes, herbicide applications to treat invasive plant species, and in the longer term due to traffic on dirt roads, emissions from vehicles and on-site operations, and cumulative impacts from surrounding activities such as agriculture and fire. The GMP/DEIS proposes construction of a new visitor center, use of prescribed fire to manage landscapes and herbicides to treat invasive plants species, and trail extensions and access road work and use.

### *Recommendation*

We recommend that the final GMP/EIS provide additional discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), and criteria pollutant non-attainment areas in or near the park. The analysis of air quality should estimate emissions of pollutants, discuss the timeframe for release of these emissions and specify sources. The potential impacts to air quality (including cumulative and indirect impacts) from construction and operation activities should also be analyzed. We also recommend development of an Equipment Emissions Mitigation Plan that identifies actions to reduce diesel emissions, particulates, carbon monoxide, hydrocarbons, and NO<sub>x</sub> associated with construction activities.

### **Easements and land exchanges**

The GMP/DEIS indicates that under the Preferred Alternative, the NPS would extend the park boundaries by acquiring lands now owned by Washington State, BLM, and other private landowners (p. 66).

*Recommendation*

We recommend the final GMP/EIS include information about the status of easement agreements and land acquisition, and show resulting alterations in park boundary locations, preferably with a map.

**Tribal consultations**

Since information in the GMP/DEIS indicates that throughout the park, there are many cultural sites with resources associated with native tribes, it is possible that the proposed management plan could have impacts on tribal resources.

*Recommendation*

We recommend that the final GMP/EIS include a discussion about the consultations NPS has had with Tribes potentially impacted by the proposed action, their outcomes, and a discussion of how issues raised in the consultations with Tribes were addressed.

**Park User Capacity**

The draft GMP/EIS indicates that no visitor use management plan currently exists at the park (p. 68), and that a workshop addressing the topic was held in October of 2005. The document also reveals that the results of this workshop are on file at the park.

*Recommendation*

EPA recommends that a summary of the workshop results be included in the final GMP/EIS along with a discussion of the impacts increased user capacity may cause to park resources. If the impacts are adverse and significant, then we recommend that the final GMP/EIS indicate how they will be minimized or mitigated.

Based on our concerns about potential adverse impacts to water and air quality and incomplete information, we have assigned a rating of EC-2 (Environmental Concerns-Insufficient Information) to the GMP/DEIS. An explanation of this rating is enclosed.

Thank you for the opportunity to review this GMP/DEIS. If you have questions or comments concerning our review, please contact Theo Mbabaliye at (206) 553-6322 or me at (206) 553-1601.

Sincerely,



Christine B. Reichgott, Manager  
NEPA Review Unit

Enclosures

cc: EPA Washington Operations Office  
The Lummi Tribe

**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.

MAR 17 2008

PNR-OC



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*The Voice for the Environment of the San Juan Islands and the Northwest Straits Marine Ecosystem*

TO: Peter Dederich

FROM: Tina Whitman

SUBJECT: San Juan Island National Historical Park Draft General Management Plan

DATE: March 14, 2008

This letter is sent in support of alternative C in the draft Management Plan for the San Juan Island National Historical Park. Friends of the San Juans is pleased to see the proposed scope expansion and fully supports inclusion of improved management and interpretation of the Parks' natural resources. Specific areas of the plan most relevant to achieving these important resource protection goals include the following:

- **Mitchell Hill:** Acquisition or extended management boundaries for Mitchell Hill will provide the watershed area essential for protection of marine water quality, freshwater and marine resources including cutthroat trout and eelgrass.
- **Tideland and Bedland Leasing:** The Park has extensive priority nearshore marine resources that could benefit from improved protection through conservation leasing of Washington Department of Natural Resources (DNR) tidelands and bedlands. We encourage the Park to continue its work with DNR to explore this management option.
- **Land Use:** We support the Parks' proposal to extend their authority to allow coordination with San Juan County on land use issues. With high development pressures and approximately 50% of the county's parcels still undeveloped, integrated planning will be an essential component of long-term protection of the Parks natural and cultural resources.
- **Island Marble:** ongoing habitat monitoring and restoration efforts will play a critical role in protection of the Island Marble butterfly, as well as other at-risk and priority species.
- **Nearshore Resources:** The extensive shoreline and intertidal forage fish, eelgrass, marine riparian and shellfish resources of the Park are significant, and unique enough to warrant individual management consideration. We recommend the Park expand the natural resources table to designate a separate row that specifically addresses these habitats and

species, instead of lumping them in the general 'natural resources' category. In addition, we recommend that the maps utilized to communicate the management zones and alternatives be updated to include forage fish spawning beaches and eelgrass beds.

- Alternative B Boat Ramp: while the plan is unclear as to the details of the proposed new 'constructed' kayak and canoe landing in English Camp, it should be noted that the location is a documented year round surf smelt spawning site and that this proposed activity is likely inconsistent with protection of this spawning habitat.

In conclusion, Friends of the San Juans commends the Park on their work to improve protection of the extensive natural resources it's manages, in addition to its strong cultural protection and education programs, and recommends full implementation of Alternative C.



**National Parks Conservation Association®**  
Protecting Our National Parks for Future Generations®

March 14, 2008

Superintendent Peter Dederich  
San Juan Island National Historical Park  
909 1<sup>st</sup> Ave. Ste. 500  
Seattle, WA 98104

**RE: Comments on the San Juan Island National Historical Park Draft General Management Plan and Environmental Impact Statement**

Dear Superintendent Dederich:

On behalf of the National Parks Conservation Association (NPCA) and the more than 340,000 people we represent, I respectfully submit the following comments on the draft general management plan.

NPCA supports Alternative C, the National Park Service's (NPS) preferred choice. In fact, we strongly support many aspects of this option including the acquisition and relocation of historic buildings, the continuation of recreational uses such as biking and horse back riding, the building of a new visitor center at American Camp and the proposed boundary adjustments at English and American Camps.

We only have a few concerns with the preferred alternative. While we understand the remote location and limited area infrastructure often require park visitors to travel to the park by car, we encourage the Park Service to explore and expand mass transit options at the park. In addition, to encourage visitor use of more environmentally preferable automobiles, the NPS should consider reserved parking for hybrid vehicles.

Further, the NPS is to be commended for its commitment to protect area resources and native wildlife through the development of a resources management plan, we encourage the Park Service to set a timeline for adoption of this plan. We understand that implementation of most of the GMP components are dependent upon Congressional funding, yet we are concerned that lacking a general plan deadline may push it off its completion for the indefinite future.

Finally, we are extremely encouraged to see the NPS willingness to participate in the Climate Friendly Park Program. NPCA is working closely with the Park Service on the development and implementation of this program and here in the northwest we are happy to assist implementation of the program. Along those lines, we urge the NPS to add climate change and its impact upon San Juan Island NHP to the list of proposed interpretive programs and issues. NPCA's Unnatural Disaster Climate Change report can be found here: <http://www.npca.org/globalwarming/>

The Park Service's draft GMP for San Juan Island NHP is a significant step in the right direction. NPCA applauds the NPS for the time and energy that went into the drafting of this document.

Sincerely,

Sean Smith  
Regional Director

Northwest Regional Office  
313-A First Avenue, South • Seattle, WA 98104  
206.903.1444 • Fax 206.903.1448 • [nwro@npca.org](mailto:nwro@npca.org) • [www.npca.org/northwest](http://www.npca.org/northwest)

**Name:** Diana Barg  
**Organization:** Samish Indian Nation  
**Organization Type:** I - Unaffiliated Individual  
**Address:** P.O. Box 217  
Anacortes WA, 98221  
Anacortes, WA 98221  
USA  
**E-mail:** dbarg@samishtribe.nsn.us

#### Correspondence Information

**Status:** New **Park Correspondence Log:**  
**Date Sent:** 03/14/2008 **Date Received:** 03/14/2008  
**Number of Signatures:** 1 **Form Letter:** No  
**Contains Request(s):** No **Type:** Web Form  
**Notes:**

#### Correspondence Text

Peter Dederich, Superintendent  
San Juan Island National Historical Park  
National Park Service  
650 Mullis Street, Suite 100  
Friday Harbor, Washington 98250

Dear Mr. Dederich,

The San Juan Island National Historical Park Draft General Management Plan and Environmental Impact Statement is very comprehensive taking into consideration the varied objectives of the Park, the resources managed by the Park and the visitor experience. It also highlights the good stewardship practices the National Parks Service adheres to regarding cultural resources. The following comments address the treatment of cultural resources in the San Juan Island National Historical Park Draft GMP/EIS and are the opinion of the Samish Indian Nation Cultural Resources Department based on the information available at this time.

Common to all alternatives, developing management plans as well as resource stewardship and archaeological research strategies will help ensure resources are protected and preserved through identification and available up to date information to be used to protect, preserve and when appropriate, interpret the resources as well as review proposed actions by the Park. Protection and preservation will also be accomplished through updating records in the National Register of Historic Places as well as developing new nominations for historic structures and pre-contact Native American sites. Conducting archaeological surveys and research on cultural resources will help ensure they are not adversely affected or that any effects can be mitigated.

Enhancing the interpretation of Native American culture and prehistory through consultation will strengthen an important element of the Park, San Juan Island and the visitor experience. Although we support the idea of enhancing interpretation of Native American culture and history the possibility of self or Ranger guided tours or location maps of the archaeological sites that were mentioned in the Draft GMP/EIS are of concern due to the sensitive nature of the area and materials located within the San Juan Island National Historical Parks. Increased exposure has the potential to adversely impact the cultural resources. Focusing on the Native American history of the area, resource use, interaction with

the natural environment and interaction with the encampment period community could be utilized for education with less potential to cause adverse effects to the resources.

Allowing the Parks museum collections to be available for research, interpretation and education will be a valuable resource and may enhance the visitor experience, scientific endeavors and sense of cultural connection to individuals, however, we are concerned with the collections being available to the public as stated in several areas of the Draft GMP/EIS. This action may hinder the preservation of the collections by taking them out of a controlled environment as well as possibly allowing access to fragile or culturally sensitive materials.

Chapter 5, the Affected Environment, describes the increased availability of the San Juan Island National Historical Park archival and material cultural collections. Some of the options described in this chapter will benefit the general public, students, researchers, other agencies and those individuals with a cultural connection to the area or objects. It may be beneficial to make certain parts of the archival and material cultural collections available to the public online or at various Park or collections management locations. Other options being considered may lead to adverse effects to cultural resources and are of concern. We are specifically concerned with the uncensored release of information contained in portions of the field notes, and reports and surveys of the archaeological sites as well as releasing maps and other locational information. Enhanced information availability will be a valuable resource, but should only be done if cultural resources will not be at risk.

Regarding cultural resources, Alternative C, the Park's preferred alternative, is the most comprehensive and beneficial to the objectives of the Park, the visitor experience and the protection and preservation of cultural resources. The adverse impacts to archaeological sites through construction activities are reduced in Alternative C over Alternative B and the increased staff positions and collections management and curation space in both Alternative B and C will benefit the cultural resources making Alternative C the preferred alternative of the Samish Indian Nation. The acquisition of additional land by the NPS for the San Juan Island National Historical Parks will benefit cultural resources located on the properties through protection and preservation as well as the ability to better understand and interpret the resources in a more complete context.

In summation, Alternative C, the Park's preferred alternative is also the preferred alternative of the Samish Indian Nation as it is more beneficial overall to cultural resources managed by the San Juan Island National Historical Park. Although increasing the availability of information on cultural resources and enhancing the interpretation of Native American culture and pre-contact practices will add an important element to the Park and increase understanding of the history of San Juan Island it should be done responsibly to limit adverse effects to the cultural resources managed by the Park and invaluable to the Samish. We request continued information on the development of the Draft GMP/EIS and the management plans and resource stewardship and archaeological research strategies that will be developed under all alternatives. We look forward to the possibility of developing Park information and interpretive resources during consultation in conjunction with other interested parties. Thank you for the opportunity to comment on the San Juan Island National Historical Park Draft General Management Plan and Environmental Impact Statement and we look forward to continuing to work with the National Park Service in the future.

Sincerely,

Diana M. Barg  
Cultural Resources Program Manager  
Samish Indian Nation

Peter Dederich  
Superintendent  
San Juan Island National Historical Park  
650 Mullis Street, Suite 100  
Friday Harbor, WA 98250

SAN JUAN ISLANDS



CONSERVATION  
DISTRICT  
SAN JUAN COUNTY, WASHINGTON

February 7, 2008

Dear Superintendent Dederich,

I commend San Juan Island National Historical Park for an excellent Draft General Management Plan/Environmental Impact Statement and strongly endorse Alternative C of the Plan.

The San Juan Island National Historical Park is a stunning natural and cultural resource that we are most fortunate to enjoy year-round on this island. The historical significance of what happened here in the 19<sup>th</sup> century is still to be fully appreciated. It makes good common sense to broaden the scope of resource management and interpretation programs, from both the Park's and the community's perspective. The benefits are clearly mutual. Expanded opportunities for educational programming and new trails will be treasured by resident and visitor alike. Preservation of existing buildings, acquisition of historic buildings, expanded ecosystem management, and implementation of a Climate Friendly Parks Program will offer an enhanced Park experience. Of special significance is the encouragement of members of our regional Native American communities to participate in Park programs and share their unique knowledge of this island that they inhabited for thousands of years. Alternative C of the Plan is a "win-win" management direction for all concerned.

If we can be of assistance in any way, we would welcome the opportunity to work together.

Best Regards,

A handwritten signature in black ink that reads "Ron Zee". The signature is written in a cursive, flowing style with a long horizontal line extending to the right.

Ron Zee  
District Manager

OFFICE: 540 GUARD ST. MAILING: 350 COURT ST #10 • FRIDAY HARBOR, WA • 98250  
PHONE: 360.378.6621 • FAX: 360.378.2445 • WEBSITE: WWW.SANJUANISLANDSCD.ORG



# San Juan County Council

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350 Court Street No. 1  
Friday Harbor, WA 98250  
(360) 378 - 2898

District 1, Kevin M. M. Ranker  
District 2, Rich Peterson  
District 3, Howard Rosenfeld

District 4, Alan Lichter  
District 5, Gene Knapp  
District 6, Bob Myhr

March 5, 2008

Chris Davis & John Sherman  
San Juan Island National Historic Park  
P.O. Box 429  
Friday Harbor, WA 98250

Dear Mr. Davis & Mr. Sherman;

Thank you for considering the comments of the San Juan County Council regarding the San Juan Island National Historic Park General Management Plan (GMP). San Juan County strongly endorses Preferred Alternative C of the GMP because it offers the most benefits with the fewest negative impacts. We support Preferred Alternative C for the following reasons.

## 1. Boundary modifications:

Adding Mitchell Hill to the San Juan Island National Historic Park is of the highest priority for the citizens of San Juan County. Permanently preserving the historic, recreational and natural resources of Mitchell Hill on San Juan Island by expanding the boundary of the San Juan Island National Historic Park to include the property was voted by the San Juan County Council as the top federal legislative priority in 2008.

One of the largest threatened undeveloped parcels in San Juan County, Mitchell Hill is a natural treasure providing excellent environmental, cultural, historic and recreation opportunities including: miles of hiking and biking trails, historic military roads and a critical watershed that supports endangered steelhead habitat. For the past several years, the current manager of Mitchell Hill, Washington State Department of Natural Resources (DNR) has been divesting properties that do not produce revenue for the school-land trusts managed by the agency. Early in 2006 DNR was discussing a "land swap" with a developer who would give DNR timberland in eastern Washington for the Mitchell Hill property in order to develop a gated community of large estate homes. In June of 2006, DNR agreed to a three-year stay to allow the National Park to finish their GMP and develop a strategy for acquisition of this precious property.

Expanding the boundaries of the San Juan Island National Historic Park to include the Mitchell Hill property is the San Juan County Council's top priority within the GMP.

We also very much appreciate the expansion of the park boundary to include DNR and Bureau of Land Management (BLM) land at American Camp (plus one small private parcel) which will give NPS options to either acquire those properties from willing sellers/donors or to work with the other agencies to manage them as a seamless protected natural resource area. This expansion will benefit

hikers, improve safe access, and allow collaborative resource management efforts. It is important that existing water rights for Cattle Point and Cape San Juan be grandfathered, and we appreciate that the GMP addresses this issue. Because much of this land is already in some form of protected status, this should be prioritized after the Mitchell Hill acquisition is completed.

We also hope that the San Juan Island National Historic Park will continue to work closely with other agencies and the County regarding the DNR Aquatic Reserve Program to ensure the protection of the adjacent tidelands. This land-sea protection takes into account critical ecosystem functions and ecosystem connections.

## 2. Landscape Restoration:

We admire the GMP plans to develop extensive landscape/native habitat restoration, based on pilot projects the park has been doing over the past few years. Around the time of the Pig War, American Camp probably looked much like Yellow Island; (the 10-acre Nature Conservancy property northeast of San Juan Island) does today. Yellow Island has been the subject of more than 20 years of restoration effort, and is now a tremendous draw for visitors with its native spring wildflowers. In addition to scenic beauty, restoration will also benefit many species of native wildlife, including the Island Marble butterfly.

## 3. Historic Buildings:

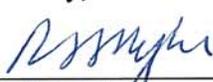
Acquiring, restoring and returning to American Camp, the Brown House in the Town of Friday Harbor, will provide an important historical connection for visitors and local citizens. Combined with the restoration of the interior of the officer's quarters at American Camp and the interior of the old hospital at English Camp, the Brown House would enhance educational opportunities that will attract additional visitors to the National Park and San Juan County.

## 4. Trails:

Connecting the trail systems of the National Park to the island-wide trail network being implemented by the San Juan Island Trails Committee is also of great interest to San Juan County. This effort should include working with the San Juan Island Trails Committee to develop clear and safe connections between the Island-wide system and the Old Military Road trail.

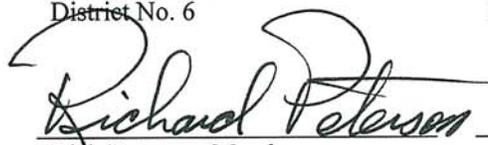
Thank you for considering these comments.

Sincerely,

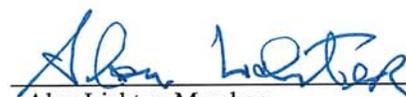
  
\_\_\_\_\_  
Bob Myhr, Member  
District No. 6

  
\_\_\_\_\_  
Howard Rosenfeld, Chair  
District No. 3

**EXCUSED ABSENT**  
\_\_\_\_\_  
Kevin M. M. Ranker, Member  
District No. 1

  
\_\_\_\_\_  
Rich Peterson, Member  
District No. 2

  
\_\_\_\_\_  
Gene Knapp, Vice Chair  
District No. 5

  
\_\_\_\_\_  
Alan Lichter, Member  
District No. 4



**San Juan County  
Marine Resources Committee**

PO Box 947  
Friday Harbor, WA 98250  
360-370-7592  
Email: [maryk@co.san-juan.wa.us](mailto:maryk@co.san-juan.wa.us)  
Web site: [www.sjcmrc.org](http://www.sjcmrc.org)

March 14, 2008

Peter Dederich, Superintendent  
San Juan Island National Historical Park  
650 Mullis Street, Suite 100  
Friday Harbor, WA 98250

Dear Peter,

This letter is sent in support of alternative C in the draft Management Plan for the San Juan Island National Historical Park. We are pleased that elements of this management option help implement three of the top protection strategies from the San Juan County Marine Stewardship Area plan and we look forward to working with you to carry them out. Relevant areas include:

- Fostering a marine stewardship ethic in residents and visitors.
- Preserve and manage public access to natural shorelines and marine views, coupled with a strong stewardship message and compatible behavior expectations.
- Manage upland and nearshore activities to reduce harm to marine habitat and water quality.

Access to nature is a critical prerequisite for fostering a stewardship ethic. The parks offer some of the best opportunities for residents and visitors to bond to nature and learn how to become good stewards. This bond is our best insurance for the protection of marine resources. We support your intention in alternative C to educate visitors about water quality and habitat, develop a cooperative management plan for Garrison and Westcott bays to promote sustainable boating, mooring, anchorage, adherence to a “no-wake” zone and other protective measures.

We commend your plans for employing green building practices in the construction of a visitors’ center at English Camp and the restoration of native prairies at American Camp. The parks will provide much needed models for sustainable development, restoration, preservation and good stewardship that will help to establish these standards in our community. The addition of the Mitchell Hill property will also provide new opportunity to demonstrate connections between upland activities and the health of the marine environment and afford protection to the newly documented cutthroat trout population.

Another area where we can further our mutual goals is through management of an Aquatic Reserve, designated by the Department of Natural Resources, in the San Juans.

We have appreciated your partnership with us in pursuing this nomination. If the proposal is successful, we will work with tribal, federal, state and local agencies and organizations to create a collaborative management plan for state owned submerged lands and adjacent upland and shoreline properties in the Reserve. American and English Camps offer some of the best sites for preservation, education and recreation in the proposed reserve. The expanded role outlined in alternative C for the preservation of natural and cultural resources in the parks improves our collective ability to provide long term management and maintenance of properties in the reserve.

Our collaboration is warranted in monitoring of marine resources. The MRC is currently developing an inventory of monitoring efforts in the MSA as the first step in the development of an MSA monitoring plan. Monitoring wildlife and invasive species in the parks as described in your management plan will add to an assessment of biodiversity in the archipelago. The upcoming Marine Managers workshop in May will focus on how we can work with local and regional managers to create a collaborative monitoring program. We welcome your participation.

Thank you for the opportunity to comment on the proposed management plan. We are enthusiastic about the future of the San Juan Island National Historic Park and look forward to working with you to carry it out.

Sincerely,

A handwritten signature in blue ink that reads "Kit Rawson". The signature is written in a cursive, flowing style.

Kit Rawson  
Chair, San Juan County Marine Resources Committee

Cc: Pete Rose, County Administrator  
San Juan County Council

MAR 19 2008

PNR-OC



PROMOTING STEWARDSHIP OF WHALES AND THE SALISH SEA ECOSYSTEM THROUGH EDUCATION AND RESEARCH

March 18, 2008

Peter Dederich  
San Juan Island NHP  
Superintendent  
P.O. Box 429  
Friday Harbor, WA 98250

Dear Mr. Dederich:

The Whale Museum would like to thank you for the opportunity to provide comments on the San Juan Island National Historical Park General Management Plan. We appreciate your efforts to explore a wide variety of options for the management of some of the most diverse and special places within the San Juan Islands. Please accept the following comments on behalf of The Whale Museum.

The Whale Museum supports the National Parks Service's Preferred Alternative C. We applaud this management plan because it places a high prioritization on natural and cultural resource management while also supporting expanded visitor opportunities with improved interpretation facilities, trails and educational programming. The Whale Museum is excited to see plans for an enlarged visitors center with new and expanded exhibits on natural and cultural resources and heartily approves the creation of an expanded network of trails that connects to an island wide trails system.

The Whale Museum commends the National Park Service for taking an active role in managing the marine resources within the park and adjoining uplands. The Whale Museum is particularly supportive of management actions such as these that focus efforts to protect nearshore habitats as they are critical in supporting both forage fish and salmon populations that are the main prey-base for the endangered population of Southern Resident Killer Whales. Partnering with local management agencies such as the San Juan County Marine Resources Committee is an excellent way to further mutual resource protection objectives. The Whale Museum is looking forward to continuing its excellent working relationship with the National Park Service, and is especially excited to work with the park and the National Marine Fisheries Service to explore options to expand the Whale Watch Exclusion Zone for Motor Vessels to include marine areas adjacent to the park and to help promote shore-based whale viewing opportunities and marine mammal and marine stewardship informational displays.

We look forward to working with the wonderful park staff and to the continued protection of the islands natural and cultural resources that the National Park Service provides long in to the future.

Sincerely,

Val Veirs, PhD  
Chair, The Whale Museum Board of Directors

Jenny L. Atkinson  
Director, The Whale Museum

**THE WHALE MUSEUM**

PO Box 945 • 62 First Street N. • Friday Harbor, WA • 98250  
360.378.4710 • FAX 360.378.5790 • www.whalemuseum.org

RECEIVED

MAR 11 2008



## San Juan Island Trails Committee

*Facilitating and participating actively in the creation, maintenance and use  
of a network of trails for non-motorized use on San Juan Island*

Mr. Peter Dederich  
Superintendent  
San Juan Island NHP

9 March 2008

Dear Mr. Dederich:

This letter is written to provide you with comments on the draft General Management Plan (GMP) produced by the National Park Service (NPS) for the use and preservation of the San Juan Island National Historical Park. This plan was presented to the San Juan community on 7 February 2008 at two well attended public forums in Friday Harbor. These forums helped islanders more thoroughly understand the plan and allowed us to ask questions on the ramifications of the GMP in discussion break-out sessions.

The impression of the GMP document is that it is a well thought out and comprehensive guide on how public use can be tolerated in a fragile environment. The islanders are a rather fiercely protective people who understand more than most the degradation that can result to a beautiful but sensitive resource when subjected to over or improper use. The GMP Environmental Impact Statement (EIS) reflects a shared understanding of this precious resource.

The San Juan Island Trails Committee is a grass-roots all-volunteer organization of over 200 islanders who – simply put – enjoy hiking in paradise. Our goal is the creation of a network of non-motorized trails that will allow islanders and visitors alike access from one island attraction to another. We feel that this is a win-win goal for islanders, visitors and our environment. With this in mind, it is easy to see that all Parks on San Juan Island, and particularly the NPS, are key partners in the SJI trails network. Continued cooperation is a central ingredient in our trails planning.

With respect to the options presented in the GMP, we would like to add our voice to the endorsement of Alternative C as being most consistent with the environmental values espoused by Islanders. While not the result of a formal poll, this opinion represents the gist of the many discussions that I have participated in with my fellow island residents. It seems to allow resource management in a more comprehensive manner and provides the maximum protection for the environment that we all enjoy. The emphasis on visitor education regarding the nature and sensitivity of park resources is particularly germane. Park boundary expansion around American Camp and the addition of the Mitchell Hill preserve are seen as extensions of this protective envelope. Our hope is that creating a visitor attitude of environmental respect will carry over from the Parks to the island in general.

Congratulations on a beautiful, well written and readable document.

A handwritten signature in black ink, appearing to read "Don Jarrell", with a long, sweeping horizontal line extending to the right.

Don Jarrell, Chairman  
San Juan Island Trails Committee

**Name:** Richard Karon  
**Organization:** SJI Trail Riding Club  
**Organization Type:** I - Unaffiliated Individual  
**Address:**  
Friday Harbor, WA 98250  
USA  
**E-mail:** rkaron@centurytel.net

#### Correspondence Information

**Status:** New                      **Park Correspondence Log:**  
**Date Sent:** 02/08/2008      **Date Received:** 02/08/2008  
**Number of Signatures:** 1    **Form Letter:** No  
**Contains Request(s):** No    **Type:** Web Form  
**Notes:**

#### Correspondence Text

I talked with Amanda Kaplan yesterday at the Public Open House on SJI and she entered a comment on the oversized paper but I want to formally give it again as it is very important to equestrian users should the Park acquire the Mitchell Hill property. As equestrians we have ridden that property extensively, some of us for over 20 years and have been the major caretakers of the land and trails. Our maintenance, along with several mountain bikers, has kept the trails open all these years. The current DNR trails provide our only connection to Roche Harbor Highlands trails which we also help to maintain through our partnership with the group managed by Will Hamilton, of Resource Management.

Therefore, under Recreation/Equestrian we would like to see the same language that is used regarding Bicycle Use under all Alternatives: "if additional land is required, partner with equestrian user groups to maintain multi-use trails and enforce proper use of trails."

Sincerely,

Rik Karon  
Chairman, San Juan Islands Trail Riding Club

# LIST OF DRAFT GMP/EIS RECIPIENTS

## Federal Agencies and Officials

Advisory Council on Historic Preservation,  
Lakewood, CO  
Honorable Maria Cantwell, U.S. Senate, Washington,  
D.C.  
Honorable Patty Murray, U.S. Senate, Washington,  
D.C.  
Honorable Rick Larsen, U.S. House of  
Representatives, Washington, D.C.  
National Oceanic and Atmospheric Administration,  
National Marine Protected Areas Center, Monterey,  
CA  
National Park Service, Death Valley National Park,  
Death Valley, CA  
National Park Service, Denali National Park, Denali  
Park, AK  
National Park Service, Ebey's Landing National  
Historical Reserve, Coupeville, WA  
National Park Service, Geologic Resource Division,  
Denver, CO  
U.S. Army Corps of Engineers, Washington, D.C.  
U.S. Army Engineering Waterways Experiment  
Station, Vicksburg MS  
U.S. Bureau of Land Management, Wenatchee, WA  
U.S. Bureau of Land Management, District Office,  
Spokane, WA  
U.S. Department of Transportation, Federal Highway  
Administration, Vancouver, WA  
U.S. Environmental Protection Agency, Region 10,  
Seattle, WA  
U.S. Fish and Wildlife Service, Lacey, Washington

## Tribes

Jamestown S'Klallam Tribal Council, Sequim, WA  
Lower Elwha Tribal Community Council, Port  
Angeles, WA  
Lummi Cultural Department, Bellingham, WA  
Lummi Indian Business Council, Bellingham, WA  
Lummi Indian Tribe, Bellingham, WA  
Port Gamble S'Klallam Tribe, Kingston, WA  
Samish Indian Nation, Anacortes, WA  
Swinomish Indian Tribal Community, LaConner, WA

## State and Local Agencies and Officials

Cape San Juan Fire, Friday Harbor, WA  
Honorable Jeff Morris, 40th Legislative District

Representative, Olympia, WA  
Honorable Dave Quall, 40th Legislative District  
Representative, Olympia, WA  
Honorable Harriet A. Spanel, 40th Legislative District  
Senator, Olympia, WA  
Lime Kiln State Park, Friday Harbor, WA  
Mayor of Friday Harbor, Friday Harbor, WA  
San Juan County Board of County Commissioners,  
Friday Harbor, WA  
San Juan County Conservation District, Friday  
Harbor, WA  
San Juan County Land Bank, Friday Harbor, WA  
San Juan County Marine Resource Commission,  
Friday Harbor, WA  
San Juan County Noxious Weed Control Board, Friday  
Harbor, WA  
San Juan County Parks, Friday Harbor, WA  
San Juan County Permit Center, Friday Harbor, WA  
San Juan County Planning Department, Friday  
Harbor, WA  
San Juan County Public Works Department, Friday  
Harbor, WA  
San Juan Fire District #3, Friday Harbor, WA  
San Juan Island Park and Recreation, Friday Harbor,  
WA  
Town of Friday Harbor, Land Use Administrator,  
Friday Harbor, WA  
Washington Department of Ecology, Bellingham, WA  
Washington Department of Ecology, Federal  
Consistency Program, Olympia, WA  
Washington Department of Natural Resources,  
Northwest Region, Sedro Woolley, WA  
Washington State Historic Preservation Office,  
Olympia, WA

## Organizations

Cape San Juan Commission, Friday Harbor, WA  
Cattle Point Water District, Friday Harbor, WA  
Center for the Study of Coast Salish Environments,  
Anacortes, WA  
Friends of the San Juans, Friday Harbor, WA  
Humane Society of the U.S., Washington, D.C.  
Islands' Oil Spill Association, Friday Harbor, WA  
National Parks Conservation Association, Seattle, WA  
Sierra Club, Northwest Chapter, Seattle, WA  
San Juan Island Chamber of Commerce, Friday  
Harbor, WA  
San Juan Island Visitors Bureau, Friday Harbor, WA  
San Juan Islands Audubon Society Deer Harbor, WA  
San Juan Preservation Trust, Lopez, WA  
San Juan Trails Committee, Friday Harbor, WA  
Sierra Club, Cascade Chapter, Seattle, WA  
Sierra Club, Cascade Chapter, Mount Baker Group,

Bellingham, WA  
Surfrider Foundation, Friday Harbor, WA  
The Friday Harbor Whale Museum, Friday Harbor, WA  
The Nature Conservancy, Seattle, WA  
The Nature Conservancy, Marine Conservation Program, Seattle, WA  
The Trust for Public Land, Seattle, WA  
Washington Environmental Council, Seattle, WA  
Washington Native Plant Society, Friday Harbor, WA  
Washington Native Plant Society, Olga, WA

## **Business and Industry**

Coastal Geologic Services, Bellingham, WA  
ECO Resource Group, Seattle, WA  
Garrison Bay Plantation  
Haff Engineering and Management Services  
HDR Engineering, Inc., Bellevue, WA  
Puget Sound BioSurvey, Friday Harbor, WA  
Roche Harbor Village, Friday Harbor, WA  
The Onyx Group, Poulsbo, WA

## **Schools, Libraries, and Institutions**

Coastal Engineering Research Board, Atlanta, GA  
Oregon Museum of Science and Industry Marine Science Camps, Portland, OR  
Oregon Museum of Science and Industry, Science Camps, Redmond, OR  
San Juan Island Library, Friday Harbor, WA  
San Juan Nature Institute, Friday Harbor, WA  
University of Washington, Archaeology Department, Seattle, WA  
University of Washington, Burke Museum, Seattle, WA  
University of Washington, Friday Harbor Labs, Friday Harbor, WA  
University of Washington, School of Oceanography, Seattle, WA  
Washington State University, Cooperative Extension, San Juan County, Friday Harbor, WA  
Western Washington University, Huxley College of Environmental Studies, Bellingham, WA

## **Media**

San Juan Journal, Friday Harbor, WA  
The Island's Sounder, Eastsound, WA  
The Seattle Post-Intelligencer, Seattle, WA  
The Seattle Times, Seattle, WA

