

**U.S. Department of the Interior
Bureau of Land Management**



**San Juan Islands National Monument
Resource Management Plan
and Environmental Impact Statement**

Scoping Report—Supplement (Comments Received During Scoping)

Comments received by the Bureau of Land Management during the scoping period for the San Juan Islands National Monument Resource Management Plan (March 2-April 1, 2015)

Introduction

During the scoping period (March 2, 2015, through April 10, 2015) for the San Juan Islands National Monument Resource Management Plan the Bureau of Land Management (BLM) received 88 public comments (letters, emails, or paper comment forms). The text from these submissions appears below. The BLM has removed personal identifying information contained in comments from individual members of the public to protect the privacy of the submitter.

The submissions are organized by the organizational categories of the entity that submitted the comments.

1. Other Federal Agencies
2. Native American Tribes
3. State Agencies
4. Counties and Local Governments
5. Non-Governmental Organizations
6. Public-at-Large

The full scoping report, along with additional information about the planning effort, can be found online at www.blm.gov/or/plans/sanjuanislandsnm/

Other Federal Agencies



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

April 1, 2015

Lauren Pidot, Team Lead
Bureau of Land Management
Spokane District Office
1103 North Fancher Road
Spokane Valley, Washington 99212

Dear Ms. Pidot:

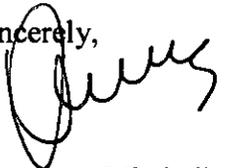
We have reviewed your Federal Register *Notice Of Intent* to prepare a Resource Management Plan/Environmental Impact Statement (RMP/EIS) for the **San Juan Islands National Monument**, Washington (EPA Region 10 Project Number: 10-026-BLM). Our review of the *NOI* was conducted in accordance with the EPA responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act, and the Council on Environmental Quality regulations for implementing NEPA. Specifically, Section 309 of the CAA directs the EPA to review and comment in writing on environmental impacts associated with all major Federal actions.

According to the *NOI*, the Bureau of Land Management (BLM) proposes to evaluate potential environmental impacts of various actions and approaches to protect and conserve the Monument's resources for the benefit of all Americans as called for in the Presidential Proclamation 8947 that established the Monument in 2013. The planning area would include about 1,000 acres of BLM lands in the San Juan Islands archipelago, which includes 450 islands, rocks, and pinnacles.

The EPA encourages the development of an EIS that fully evaluates and compares project alternatives and comprehensively assesses anticipated direct, indirect, cumulative impacts of proposed plans and projects, and subsequent activities. Because of the broad purpose and need, the draft RMP/EIS should clarify whether or not the RMP/EIS would serve as a comprehensive planning framework that would guide development of future individual plans and projects, which would, then, be subject to separate NEPA analysis and review to ensure issues specific to each subsequent action can be fully analyzed and mitigation measures identified to reduce potential impacts.

The NOI includes a preliminary list of issues and environmental resources to be addressed in the RMP/EIS analysis. We offer the attached scoping comments to highlight issues the EPA believes are important to consider in the NEPA analysis for the proposed action. If you have questions about our comments, please contact me at (206) 553-6322 or electronically at mbabaliye.theogene@epa.gov.

Sincerely,



Theogene Mbabaliye
Environmental Review and Sediment Management Unit

Enclosure:

1. EPA Detailed Scoping Comments on the proposed San Juan Islands RMP/EIS
San Juan, Whatcom, and Skagit Counties, WA

**EPA Detailed Scoping Comments on the proposed
San Juan Islands RMP/EIS
San Juan, Whatcom, and Skagit Counties, WA**

Range of Alternatives

The RMP/EIS should include a range of reasonable alternatives which meet the stated purpose and need for the proposed action and are responsive to the issues identified during the scoping process. All reasonable alternatives should be considered, even if some of them could be outside the capability of the BLM jurisdiction. Environmental impacts associated with each alternative should also be presented in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision-maker and the public. These impacts should be quantified to the greatest extent possible. The EPA encourages selection of feasible alternatives which minimize environmental degradation.

Environmental effects

The draft RMP/EIS should include environmental effects and mitigation measures. This would involve delineation and description of the affected environment, indication of resources that would be impacted, the nature of the impacts, and a listing of mitigation measures for the impacts. The following topics will be of particular interest to us.

Water resources and impacts

Water quality degradation is one of EPA's primary concerns. Section 303(d) of the Clean Water Act requires the State of Washington and Tribes with approved water quality standards to identify water bodies that do not meet water quality standards and to develop water quality restoration plans to meet established water quality criteria and associated beneficial uses. Thus, the draft RMP/EIS should disclose which waters might be impacted, the nature of potential impacts, and specific pollutants likely to impact those waters. It should also report those water bodies potentially affected by the proposed action which are listed on the State's and Tribes' most current EPA-approved 303(d) lists. The draft RMP/EIS document should describe existing restoration and enhancement efforts for those waters, how the RMP/EIS will coordinate with on-going protection efforts, and any mitigation measures that will be implemented to avoid further degradation of water quality within any impaired waterbody. Please note that anti-degradation provisions of the Clean Water Act apply to those waterbodies where water quality standards are currently being met and prohibit degrading the water quality. The draft RMP/EIS should indicate how those provisions would be met by the proposed action.

Under the Clean Water Act, any project construction that would disturb a land area of one or more acres also requires a National Pollutant Discharge Elimination System permit for discharges to waters of the United States. The RMP/EIS, therefore, should document the project's consistency with applicable storm water permitting requirements and should discuss specific mitigation measures which may be necessary or beneficial in reducing adverse impacts to water quality. Since the proposed action may impact sources of drinking water, BLM should work with the Washington State Department of Ecology to help identify source water protection areas within the analysis area and, if necessary, include the following in the RMP/EIS document:

- a) Source water areas within the project area.
- b) Activities that could potentially affect source water areas.
- c) Potential contaminants that may result from the proposed project.
- d) Measures which would be taken to protect the source water protection areas.

Source water is water from streams, rivers, lakes, springs, and aquifers which is used as a supply of drinking water; and the 1996 amendments to the Safe Drinking Water Act require Federal agencies to protect sources of drinking water for communities.

Roads and their use impacts

As the RMP/EIS is developed, BLM should evaluate the impacts roads would have on waterbodies in the planning area. Roads contribute more sediments to streams and interrupt the subsurface flow of water. Where roads cut into steep slopes, they fragment habitats and disturb wildlife and accelerate noxious weed infestations. Thus, the draft RMP/EIS should include data about existing road networks and evaluate the change in road miles and density which will occur because of the proposed RMP/EIS activities and predicted impacts to water quality by roads.

Implementation of the proposed RMP/EIS projects may also involve construction of facilities, access roads, and use of heavy equipment. Those activities may compact soils and change hydrology, runoff characteristics, and ecological function of sites, affecting flows and delivery of pollutants to waterbodies. The RMP/EIS, therefore, should include a detailed discussion of the cumulative effects from this and other projects on the hydrologic conditions of the proposed project site and vicinity. It should also clearly depict reasonably foreseeable direct, indirect and cumulative impacts to groundwater and surface water resources.

Impacts to wetland, floodplain, and riparian resources

Based on information in the NOI, it is not yet clear whether wetlands are present on or adjacent to the analysis area. The RMP/EIS should describe all waters of the United States, including wetlands, which could be affected by the proposed action and alternatives, and include maps that clearly identify all waters within the planning area, data on acreages and channel lengths, habitat types, values, and functions of these waters.

If wetlands are present and would be affected by projects under the RMP/EIS, then, the document should discuss how the projects would comply with Section 404 of the Clean Water Act requirements, which are under the authority of the United States Army Corps of Engineers. It should also evaluate potential impacts to adjacent wetlands or indirect impacts to wetlands, such as hydrologic changes due to increases in impervious surfaces. Project discharges can result from a variety of activities, including road and facility construction. The RMP/EIS should disclose where there are known waters or wetlands, which would be directly or indirectly affected by the proposed RMP/EIS activities.

Activities affecting floodplains are also regulated under Section 404 of the Clean Water Act and Executive Orders 11988: *Floodplain Management* and 13690: *Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input*. Floodplains perform a vital function of conveying and dissipating the volume and energy of peak surface runoff flows downstream. Periodic flood flows form and sustain specific habitat types, such as wetland and riparian areas. The RMP/EIS, therefore, should include information on any activities that could occur in floodplains, what alternatives were considered, and steps to be taken to reduce floodplain impacts and risks. Because of their importance, unimpaired flood flows within floodplains should be preserved and flood-related damage to downstream resources should be prevented.

Habitat, Vegetation, and Wildlife

We understand that the RMP/EIS is being developed in part to protect wildlife species and habitat. Therefore, we would expect that beneficial and adverse effects on wildlife species and habitat connectivity would be analyzed. We suggest that the RMP/EIS describe the current quality and potential capacity of habitat, its use by fish and wildlife on and near the planning area, identify known fish and wildlife corridors, migration routes, and areas of seasonal fish and wildlife congregation. If fish and wildlife, aquatic, and terrestrial habitats will be significantly impacted because of activities under the proposed RMP, then the RMP/EIS should include mitigation measures to reduce the impacts.

Vegetation removal and access roads create obstacles to animals migrating through the area. Cleared areas and roads deter terrestrial animals from crossing due to lack of cover, reduced forage and browsing opportunities, changes in wildlife migration patterns, and occasional human activity in these areas. Cleared areas also create edge effects that likely favor several bird and wildlife species. Therefore, the RMP/EIS should discuss:

- Effects on habitat fragmentation and the creation of edge effects favoring some species, including mitigation measures.
- Extent of vegetation removal, whether the removal would occur on steep slopes, in or near riparian areas, and where soil damage was particularly severe due to previous activities.
- How vegetation removal would support retention of vegetation structures that are important for wildlife migration, recruitment and dispersal, rearing and feeding.

Grazing is a common activity in many watersheds and its management has been contentious due to potential impacts on water resources and vegetation, particularly in riparian areas. Concerns with degraded riparian zones following grazing include loss of biodiversity, wildlife habitat, adverse impacts to water quality, and negative effects to fish populations. Riparian zones with stable streambanks reduce, for example, sediment load to streams. This is critical for fish spawning, which is an important factor for the recovery of declining and endangered species such as salmonids. The RMP/EIS should discuss grazing impacts to riparian zones and how grazing will be managed to promote biodiversity - a vital component of healthy ecosystems. Please also include in the RMP/EIS document a map of areas that could be subject to grazing so potential conflicts with other uses can be determined and measures to reduce them and other impacts identified.

Noxious Weeds and Rare Plants

Following vegetation removal, invasive species can also aggressively spread into newly cleared or filled areas. The status of noxious weed projects within the planning area should be described and weed monitoring and control features identified. The RMP/EIS should contain measures that are consistent with Executive Order 13112, *Invasive Species*. We suggest including a description of current conditions and best management practices which will be utilized to reduce the likelihood of introduction and spread of invasive species with the proposed management activities.

If there are infestations of aquatic invasive plants (floating or submerged in water) in the planning area, the RMP/EIS should include information about such infestations and how they would be managed to prevent further deterioration of water quality within the planning area. The EPA supports integrated weed management, which would include a mix of control measures, such as cultural, biological, mechanical and chemical techniques. We do not expect heavy use of pesticides and herbicides to manage weeds within the Monument, but if they are going to be applied, the RMP/EIS should address

any potential toxic hazards related to the application of the chemicals, and describe what actions will be taken to assure that impacts by toxic substances released to the environment will be minimized. If vegetation would be burnt, then the RMP/EIS should include a smoke management program that would be followed to reduce public health impacts and potential ambient air quality exceedances.

If activities under the RMP may impact native or rare plants, the RMP/EIS should include general locations of rare plants and how these sites will be managed to minimize impacts on the plants.

Air quality impacts

The protection of air quality should be addressed in the RMP/EIS. The types of fuels to be used during construction activities, increased traffic during operations, and related volatile organic compounds and nitrogen oxides emissions should be disclosed and the relative effects on air quality and human health evaluated. Dust particulates from construction activities and ongoing operation of roadways are important concerns. Thus, the RMP/EIS should evaluate air quality impacts and detail mitigation steps, which would be taken to minimize impacts. This analysis should also address and disclose the plan's potential impacts on all criteria pollutants under the National Ambient Air Quality Standards, including ozone, visibility impairment, and air quality related values in the protection of any affected Class I Areas, any significant concentrations of hazardous air pollutants, and protection of public health.

Impacts to endangered species

The proposed plan and subsequent activities may impact endangered, threatened or candidate species listed under the Endangered Species Act, their habitats, as well as State sensitive species. The RMP/EIS should identify the endangered, threatened, and candidate species under ESA, and other sensitive species within the planning area. In addition, the document should describe the critical habitat for these species; identify any impacts the plan will have on these species and their critical habitat; and how it will meet all requirements under ESA, including consultation with the U.S. Fish and Wildlife Service, National Marine Fisheries Service and, as appropriate, with the Washington State Department of Fish and Wildlife.

Recreation and Access

The impacts from recreation and access should be analyzed and reported in the RMP/EIS. Impacts such as those from off-road vehicle use result in habitat destruction, increased sedimentation to water bodies, noise, and air pollution. The RMP/EIS should disclose all impacts associated with such activities and describe what actions will be taken to manage recreational and accessibility opportunities in the project area.

Cumulative Effects

The RMP/EIS should assess impacts over the entire area of impact, and consider the effects of other past, present and future plans and projects in and outside the planning area, together with the proposed action, including those by entities which are not affiliated with BLM. Where adverse cumulative impacts may exist, the RMP/EIS should disclose the parties who would be responsible for avoiding, minimizing, and mitigating those adverse impacts.

In determining cumulative effects, the RMP/EIS should clearly identify the resources that may be cumulatively impacted, the time over which impacts are going to occur, and the geographic area that will be impacted by the proposed plan. The focus should be on resources of concern i.e., those which are

at risk and/or are significantly impacted by the proposed plan before mitigation. In the introduction to the Cumulative Impacts Section, identify which resources are analyzed, which ones are not, and why. For each resource analyzed, the RMP/EIS should identify:

- a. Trend in the condition of the resource as a measure of present impacts e.g., the health of the resource is improving, declining, or in stasis.
- b. Current condition of the resource as a measure of past impacts e.g., the percentage of species habitat lost to date.
- c. Future condition of the resource based on an analysis of the cumulative impacts of reasonably foreseeable projects or actions added to existing conditions and current trends. For example, what will the future condition of the watershed be?
- d. Cumulative impacts from proposed alternatives and their contribution to the long-term health of the resource and provide a specific measure for the projected impact from the alternatives.
- e. Parties who would be responsible for avoiding, minimizing, and mitigating adverse impacts.
- f. Opportunities to avoid and minimize impacts, including working with other entities.

Climate change impacts

Scientific evidence supports the concern that continued increases in greenhouse gas (GHGs) emissions resulting from human activities contribute to climate change. Effects of climate change may include changes in hydrology, sea level, weather patterns, precipitation rates, and chemical reaction rates. The RMP/EIS should consider how resources affected by climate change could potentially influence the proposed plan and vice versa, especially within sensitive areas. The RMP/EIS should also quantify and disclose GHG emissions from the project and discuss mitigation measures to reduce emissions. For more information on climate change impacts, please consult the Council on Environmental Quality's *Revised Draft Guidance¹ on the Consideration of GHGs emissions and the Effects of Climate Change in NEPA Reviews*.

Coordination with Land Use Planning Activities

The RMP/EIS should discuss how the proposed action would support or conflict with the objectives of Federal, state, tribal or local land use plans, policies and controls in the analysis area and vicinity. The term "land use plans" includes all types of formally adopted documents for land use planning, conservation, zoning and related regulatory requirements. Proposed plans not yet developed should also be addressed, if the appropriate government body in a written form has formally proposed them. Of interest would be existing constraints in the analysis area e.g., power lines and utility Right-Of-Ways, floodplains, and how acceptable land uses will be consistent with applicable county and city zoning requirements, and the ability to obtain construction and operating permits and licenses.

Coordination with Tribal Governments

Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments* (November 6, 2000), was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies which have tribal implications, and to strengthen the United States government-to-government relationships with Indian tribes. The RMP/EIS should describe the process and outcome of government-to-government consultation between BLM and each of the

¹ http://www.whitehouse.gov/sites/default/files/docs/nepa_revised_draft_ghg_guidance.pdf

tribal governments within the analysis area and vicinity, issues which were raised (if any), and how those issues were addressed in the selection of alternatives.

National Historic Preservation Act (NHPA) and Executive Order 13007

Consultation for tribal cultural resources is required under Section 106 of the National Historic Preservation Act (NHPA). Historic properties under NHPA are properties that are included in the National Register of Historic Places (NRHP) or that meet the criteria for the National Register. Section 106 of the NHPA requires a Federal agency, upon determining that activities under its control could affect historic properties, consult with the appropriate State Historic Preservation Officer/Tribal Historic Preservation Officer (SHPO/THPO). In addition, Section 106 requires that Federal agencies consider the effects of their actions on cultural resources, following regulation in 36 CFR 800. Under NEPA, any impacts to tribal, cultural, or other treaty resources must be discussed and mitigated.

Executive Order 13007, *Indian Sacred Sites* (May 24, 1996) requires Federal land management agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian Religious practitioners and to avoid adversely affecting the physical integrity of such sacred sites. It is important to note that a sacred site may not meet the National Register criteria for an historic property, and that, conversely, an historic property may not meet the criteria for a sacred site.

The RMP/EIS should address the existence of any Indian sacred sites in the analysis area. It should also address Executive Order 13007, distinguish it from Section 106 of the NHPA, and discuss how BLM will avoid adversely affecting the physical integrity of sacred sites, if they exist. The RMP/EIS should provide a summary of all coordination with Tribes and with the SHPO/THPO, including identification of NRHP eligible sites, and development of a Cultural Resources Management Plan.

Environmental Justice and Public Participation

If the project area includes environmental justice populations, then, the RMP/EIS would need to address the potential for disproportionate adverse impacts to minority and low-income populations, and approaches used to foster public participation by these populations. One tool available to locate Environmental Justice populations is the Environmental Justice Geographic Assessment tool, which is available online². Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (February 11, 1994), directs Federal agencies to identify and address disproportionately high and adverse human health or environmental effects on minority and low-income populations, allowing those populations a meaningful opportunity to participate in the decision-making process.

Monitoring

Since the RMP has the potential to affect a variety of resources for an extended period, we recommend that the proposed action include an environmental inspection and mitigation-monitoring program to ensure compliance with all mitigation measures and assess their effectiveness. The RMP/EIS document should describe the monitoring program and its use as an effective feedback mechanism so that any needed adjustment can be made to meet environmental objectives throughout the life of the project.

² <http://epamap14.epa.gov/ejmap/entry.html>

Native American Tribes



THE TULALIP TRIBES

Board of Directors:

Herman Williams, Leib Sil Teed- Chairman
Les Parks-Vice Chairman
Glen Gobin, Ti Cetx - Treasurer
Marie Zackuse - Secretary
Marlin Fryberg Jr., Sxwilus - Board Member
Theresa Sheldon - Board Member
Deborah Parker, Cica yalca- Board Member
Misty Napeahi- Tribal Government General Manager Interim

6406 Marine Dr.
Tulalip, WA 98271-9694
(360) 716-4000
FAX (360) 716-0628

The Tulalip Tribes are the successors in interest to the Snohomish, Snoqualmie, and Skykomish tribes and other tribes and band signatory to the Treaty of Point Elliott

Marcia deChadenèdes, Manager
San Juan Islands National Monument RMP
P.O. Box 3, Lopez, WA 98261

April 1, 2015

Re: Tulalip Tribes' Scoping Comments for the Public Record, San Juan Islands National Monument RMP

Dear Marcia,

The Tulalip Tribes appreciate the opportunity to provide scoping comments on the development of the Resource Management Plan (RMP) for the new San Juan Islands National Monument (SJINM).

The Tulalip Tribes is a federally recognized sovereign Indian tribe with a reservation in western Washington, along the Salish Sea. The Tulalip Tribes is the successor in interest to the Snohomish, Snoqualmie and Skykomish Tribes, and other tribes and bands signatory to the Treaty of Point Elliott. Through this treaty, the Tulalip Tribes expressly reserved the right to fish and gather shellfish in their "Usual and Accustomed Areas" and to hunt and gather on all "open and unclaimed" lands, *which includes all of the federal lands in the new San Juan Islands National Monument*, managed by the BLM. The Tribes view the continued availability, use and access to resources within the new National Monument as critical to perpetuating our culture and identity as a distinct Tribe.

In light of the extensive cultural and historical ties of the Tulalip Tribes to the San Juan Islands, and the relatively few public land holdings, and even fewer federal parcels, we ask for your partnership in caring for these lands, waters, and resources that are so precious to us and upon which we both depend and have responsibility to steward wisely.

In follow up to our meeting and discussion of issues with you on 3-30-15, we submit these written comments articulating our collective interests and concerns with the development of the RMP for the new national monument:

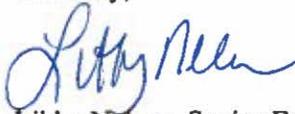
- **Include the protection of tribal treaty rights in the "Purpose and Need" and dedicate a specific section in the report to explain and address how, as a federal trustee, the BLM will ensure these rights are safeguarded.** While treaty rights were unfortunately not articulated explicitly in the Presidential Proclamation, the federal role as the trustee to safeguard these rights is the supreme law of the land, and an expectation on the part of treaty tribes with such rights in the San Juan Islands. While implied, Tulalip believes it is important to explicitly outline this purpose and need to ensure both that this goal is understood by the public, and that specific actions are taken to ensure treaty rights protection in formation of plan alternatives. Protecting treaty rights will take the form of conservation and habitat protection of the natural and cultural

resources upon which these rights depend, access to these resources, and a shared stewardship approach in the management of these resources that emphasizes a partnership with treaty tribes who possess rights in the San Juan Islands.

- **Ensure, by working closely with Tulalip and other federally-recognized tribes, that the Plan serves as an accurate educational tool for the public to tell the story of the inhabitation and use of the islands by Native peoples since time immemorial, our way of life, use of island resources, and our sustainable management of these resources over a very long period of time. Similarly, the history should provide an accurate account of the colonization of the areas by non-Indians, the treaty period and what the treaties provided to those tribes who ceded their San Juan Island territories.**
- **Ensure protection of archaeological, cultural areas and sites of concern in or adjacent to the SJINM through consultation with the Tulalip Tribes.** We request that you protect any sensitive information received from the Tribes regarding cultural sites to protect them from potential looting and desecration. As always, with any ground disturbing activities or erosion, there is a potential to disturb cultural and archaeological resources, particularly since this site is in a well-known cultural area for Indian peoples over a very long period of time. We request compliance with all state and federal laws regarding cultural/archaeological surveys, and for inadvertently discovered archaeological sites, cultural resources and Native American burials, including the requirement of immediate work stoppage and consultation in the event cultural resources or burials are disturbed. In such a case, please directly notify Richard Young, Tulalip Tribes Cultural Resources Director at: ryoung@tulaliptribes-nsn.gov and tel. (425) 239-0182.
- Given the extensive historical relationship of Tulalip's ancestors to the San Juan Islands, including the historical and large-scale cultivation of camas and other cultural plant species on the islands, **Tulalip requests that the BLM build into the RMP opportunities for the Tulalip Tribes to work in partnership with BLM to conduct meadow restoration and cultivation to favor cultural food and medicinal species, and to support a tribal treaty harvest of such plants. Use of traditional means, such as burning, as well as more modern management techniques that favor plant growth and harvest should be part of such restoration efforts. Tulalip is particularly interested in pursuing such a co-stewardship effort on the Iceberg Point property, which is in close proximity to Tribal property on Lopez Island.**

We thank you for your efforts to date to include the Tribes in this important exercise, and the opportunity to provide you with our comments at this early stage. We look forward to continued involvement in the development of the RMP. Please let us know if you require any further discussion or clarification.

Sincerely,



Libby Nelson, Senior Environmental Policy Analyst
Treaty Rights Office, Tulalip Natural and Cultural Resources Department

Cc: Ray Fryberg, Libby Nelson, Patti Gobin, Daryl Williams, Kurt Nelson, Tim Brewer

State Agencies



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Resource Management Plan Scoping

Griffith, Greg (DAHP) <Greg.Griffith@dahp.wa.gov>

Thu, Mar 19, 2015 at 3:33 PM

To: "blm_or_sanjuanislandsnm@blm.gov" <blm_or_sanjuanislandsnm@blm.gov>

Cc: "Griffith, Greg (DAHP)" <Greg.Griffith@dahp.wa.gov>

On behalf of the Washington State Historic Preservation Officer (SHPO), I am responding to your notice to our agency of BLM's intent to prepare a Resource Management Plan (RMP) for the San Juan Islands National Monument.

In response, I recommend that the RMP includes an element on cultural and historic resources in the NM. The element should include, but not be limited to: an ongoing process to identify and evaluate cultural and historic resources within the NM plus ongoing protection and management strategies. In addition, other elements of the RMP should be compatible with the intent of the cultural resources protection element and include acknowledgement of the overlap of issues and interests amongst the planning elements.

Finally, we look forward to reviewing and commenting on drafts of the RMP.

Thank you for the opportunity to comment on the scope of the RMP.

Greg Griffith

Deputy State Historic Preservation Officer

Washington State/Department of Archaeology & Historic Preservation

Greg.Griffith@dahp.wa.gov

360-586-3073 (desk)

360-890-2617 (mobile)

POB 48343/Olympia 98504-8343

Check out new State Historic Preservation Plan 2014-19: Getting the Future Right

at www.dahp.wa.gov



Counties and Local Governments

RECEIVED
MAR 24 2015

BY:

San Juan Islands National Monument Resource Management Plan
Scoping Comment:

1: Thank you for the opportunity to submit comments and for having conducted the scoping meetings on each of the major Islands. The San Juan County Noxious Weed Control Board feels it is of paramount importance that BLM address ways to help prevent the introduction of invasive plant species onto and from your properties, and to control or eradicate those noxious weeds designated for control and are located on your properties. Any delay in their removal increases the severity of their effects on ecosystems. Two examples of State and County-listed designated noxious weeds known on BLM properties are as follows: a. Spurge laurel (*Daphne laureola*) grows profusely on Victim Island (also known on Twin Rocks and Blind Islands). Due this species being spread by birds, this infestation has become a center of distribution for the entire archipelago, including outer island wildlife refuges. The berries, leaves and bark are poisonous to humans, cats and dogs. Young children are especially vulnerable to poisoning due to their small size and their tendency to eat berries, and b. Shiny geranium (*Geranium lucidum*), which is still not widely spread throughout the state, but infests Posey Island, from whence it can easily be spread to other islands by boaters visiting Posey.

2: Two changes should be made to *Table 3-1 Washington State Noxious Weeds and Invasive Plants Occurring within the San Juan Island National Monument*. English ivy and Scotch broom are designated for control in San Juan County.

Prevention is the most effective and least costly long-term management solution.

- a. Staff and volunteers should use a brush to remove soil and plant parts from shoes and clothing, equipment and vehicle tires before leaving an infested area i.e. (shiny geranium site); use pest-free project staging areas to minimize travel through infested sites; re-vegetate disturbed soil; use only weed-free hay, straw and soil for projects; take invasive plants into consideration when planning road and trail maintenance.
- b. Restrict traffic on infested sites when necessary.
- c. Provide information and appropriate identification materials to visitors, staff and volunteers.
- d. Consider signage to discourage accidental noxious weed introduction onto BLM lands.

Control: Use the full range of tools available when implementing BLM's Integrated Vegetation Management plan, including pulling, grubbing, digging, cutting, flaming, mulching, and/or the judicious use of the least toxic herbicides.

**San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form**

The Bureau of Land Management (BLM) Spokane District is seeking early public input, through a process known as scoping, as it begins preparing a Resource Management Plan (RMP) for the San Juan Islands National Monument. The RMP will provide the goals, objectives, and direction that will guide the BLM's management of the National Monument for the next 15 to 20 years. The BLM defines scoping as a collaborative public involvement process to identify planning issues to be addressed through the plan. For your comment to be reflected in the scoping report, and to be the most helpful for identifying issues to be addressed during the planning effort, please ensure that your scoping comments are submitted or postmarked by **April 1, 2015**.

The BLM wants to hear from you! The following questions have been provided to help you provide the most useful comments to the BLM but all comments are welcome. Please feel free to attach additional sheets of paper if your comments do not fit below.

1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

Please see attached -

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

Please see attached

3. What are other topics or concerns that you would like the BLM to address through the planning process?



4. Other thoughts or suggestions?

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Name: Judy Jackson
 Mailing Address: P.O. Box 1634 Eastsound, WA 98245
 Email Address: judy@sanjuanweeds.org
info@sanjuanweeds.org
jason@sanjuanweeds.org

Please indicate your affiliation by checking **one** of the following boxes:

- Individual (no affiliation) Private Organization Citizen's Group
 Elected Representative Tribal, Federal, State, or Local Government

Name of organization, government, group, or agency (if applicable) San Juan County
 Comments may be submitted via the following methods: Noxious Weed Control Program

Email: blm_or_sanjuanislandsnm@blm.gov

Mail: San Juan Islands National Monument RMP, P.O. Box 3, Lopez, WA 98261

Hand delivery: At a public meeting or BLM Lopez Island Office, 37 Washburn Place, Lopez Island, WA 98261

Fax: 503-808-6333



Non-Governmental Organizations



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Fwd: San Juan Islands Nat. Monument Resource Management Plan

Pidot, Lauren <lpidot@blm.gov>

Thu, Aug 6, 2015 at 3:59 PM

To: BLM_OR SanJuanIslandsNM <blm_or_sanjuanislandsnm@blm.gov>

On Friday, March 27, 2015, <msilence2000@yahoo.com> wrote:

Nick,

I will attach this same information to a "Scoping Comment Form" and mail this to you. It may be redundant, but I want to make sure WA Water Trails Assoc. comments are recorded into the public record.

I am including some locations that are clearly not open for over-night camping. I am doing this at your advice and not because I wish to be a pain in anybody's backside. I also want to go on the record- we are not pro-extinction! If shorebirds need habitat and it is necessary to keep people OUT of those critical nesting areas, PLEASE do not allow us to put up signs and allow paddlers to camp!

With that said, I hope you do understand our desire to open more areas (non-sensitive areas) to overnight camping. It is both a recreational issue and a safety issue- more and more people are going to the San Juan Islands to paddle sea kayaks and other human and wind powered boats. The impact of these people and boats tends to be VERY LIGHT, but many of us want to travel distances and also want to visit relatively remote areas. For this we need places to camp or other types of overnight lodging. But this is also a very tenuous mode of transport- without motors paddlers can quickly find themselves fighting strong, unexpected winds. This situation, which can affect even very experienced paddlers and guides is a compelling reason why overnight campsites, spaced throughout the San Juan archipelago, are an important safety feature worthy of consideration by all public land managers.

The recreational issue is also compelling: camping and paddling, done by folks trained in Leave No Trace ethics (which we do teach!) leaves a lighter impact than just about any other form of recreation. It spreads the mass of visitors out over vast areas of water and shoreline, and it helps raise public awareness & preserve the wild and scenic qualities of the San Juan Islands National Monument. When you look at the types of land BLM is managing- islands, rocks, headlands and areas on the south end of Lopez Island- it would seem that after shorebirds and marine mammals, paddlers would be your third most frequent class of visitors!

This is the foundation of our request. As I noted at the public meeting in Anacortes, one other aspect of this request is geographic- there are precious few places to come ashore on the entire southwest shore of San Juan Island continuing on to the south shore of Lopez Island. Between a CMT campsite on Posey Island and another on James Island east of Decatur Island, a distance of approx. 20 miles, there is exactly one (1) CMT campsite- San Juan County Park. We would very much like to change this situation.

The criteria for any good water trail campsite is simple.

- There must be a relatively flat, safe place to camp above the medium high tide line
- This location must be accessible from the water (not necessarily from the uplands)
- The use of such a site must not adversely impact wildlife
- Our members are fully capable of bringing water and packing out their own waste

Here is our overnight campsite wish list:

1. Turn Point Light Station
2. Cattle Point Lighthouse
3. Iceberg Point
4. Point Colville or nearby
5. Davis Bay Island
6. Reads Bay Island
7. Kanaka Bay Islands
8. King Islands
9. Kellet Bluff
10. Dot Island
11. Skull Island
12. Victim Island
13. Pudding Island
14. Parks Bay Island

Thank you for considering our views. I am sending this comment on behalf of, and after board of directors discussion by the Washington Water Trails Association. We currently have almost 1000 members. We have been advocating on behalf of small boat paddlers, sailors and rowers for almost 22 years.

Please let me know when you plan to visit the W.A.K.E. paddlers in Bellingham. I would be pleased to talk with you and it would be good to see those folks at the same time. I would really like to know which of the above locations are feasible! It would be a series of long and difficult paddle trips for me to check out each one... Can you assist?

Best regards,
Michael Silence
Board Member, WA Water Trails Assoc.

4649 Sunnyside Ave N #307
Seattle, WA 98103
Phone 206.545.9161
Fax: 206.547.0350
Email: wwta@wwta.org



KWIAHT

Center for the Historical Ecology of the Salish Sea

PO Box 415, Lopez, WA 98261

March 31, 2015

Comment on SJI National Monument RMP

The professional staff and volunteers of Kwiaht offer the following suggestions to BLM for the scope and priorities of the RMP for the SJI National Monument, based upon our observations and experience with these landscapes and public visitors over the last 12 years.

Our primary concern is the accurate identification and effective protection of rare species and fragile habitats that have already disappeared—or are rapidly disappearing—from the San Juan Islands outside the Monument due to growing levels of human activity as well as invasive plant species and changes in natural succession patterns.

The habitats of particular concern to us within the Monument are:

Lichen crusts on exposed bedrock, boulders, and scree. In the very young post-glacial geology of the San Juan Islands, lichens are crucial pioneers in colonizing rock surfaces, slowly accumulating organic detritus, building and stabilizing thin soils, retaining water, and eventually creating conditions suitable for colonization by bryophytes. Lichen crusts grow as little as one millimeter per year and are very sensitive to trampling, taking decades to regenerate following disturbance.

Moss meadows covering rock outcrops, boulders and thin minerogenic soils, often as a successor to a lichen crust, or combined with lichens, forming a horizontally-woven biological fabric that accumulates organic detritus and retains water faster than lichen crusts alone, and invites colonization by the seeds of vascular plants—initially herbaceous but eventually also woody species. Moss meadows grow very slowly, on the order of a centimeter per year, and are very sensitive to trampling, which tears the moss fabric off rocks in sheets, taking years to re-grow.

Culturally influenced herbaceous meadows in the San Juan Islands are relics of an indigenous Native American agricultural system centered on geophytes, similar to the traditional cultivation systems of Polynesia and the Andes. Systematic hoeing, weeding, and periodic fire suppression of encroaching woody plants has produced a very dark, deep, non-stratified soil in which the predominant organic component is charcoal rather than decaying vegetation. Relic food cultivars such as *Camassia leichtlinii*, *Fritillaria affinis*, *Brodiaea coronaria*, *Lilium columbianum*, the native *Aliums* and *Perideridia gairdnerii* are usually still present, although often mixed with and suppressed by Eurasian grasses introduced by settlers for feeding sheep over a century ago. Continuing encroachment of Eurasian weeds (mainly grasses) and woody species, facilitated by human trampling, is the principal threat to these meadows.

Other herbaceous coastal meadows represent the natural succession of emergent post-glacial coastal bluffs and outcrops from lichen crusts and moss meadows, to landscapes dominated by herbaceous vascular plants including some salt-tolerant native grasses such as *Festuca rubra*, fields of dense *Plectritis* and *Armeria*, and a diversity of native Liliaceae and Apiaceae. Woody succession has been slowed or arrested by a combination of salinity, wind, very thin soils with negligible organic reservoirs, and in the neighborhood of culturally influenced meadows, occasional flashy fires until the 1850s. Eurasian grasses are often a significant component of the contemporary vegetation. Like culturally influenced meadows, natural coastal meadows are threatened chiefly by the encroachment of Eurasian weeds (mainly grasses) and woody species, facilitated by human trampling

The four habitat types we have described are often combined or overlap especially on coastal bluffs such as the Iceberg Point landscape, where adjacent patches of culturally influenced and natural coastal meadows can be seen growing through a thin, crisp carpet composed mainly of foliose lichens and mosses, often with scattered pillows of “reindeer moss” (*Cladina rangifera*), also a lichen. This combination of lichens, mosses, and native wildflowers is unusual, and most frequently associated with the “scenic” character of the San Juan Islands.

These four sensitive habitats are also home to many species of concern, including one federally “threatened” wildflower, *Castilleja levisecta* (Golden Paintbrush). Although *Castilleja levisecta* has not been recorded growing naturally in the Monument, we found many other State-listed plant species in our surveys over the past decade. In some cases the only occurrence of the species in our region, or one of its few remaining occurrences, is in the Monument. Table A identifies rare plants that have been documented within the Monument recently. It is unclear whether a few rare plants recorded recently on National Wildlife Refuge islands may also occur on some of the Monument islands that have only been visited once briefly by our team e.g. *Castilleja victoriae*.

Some of the small islands of the Monument are densely wooded or dominated by invasive shrubs, but the sensitive habitats we have described are more widespread. Many small Monument islands are exclusively clothed in lichens and wildflower meadows such as Reeds Bay Island, and are consequently extremely vulnerable to human activity.

Although the only terrestrial animals in the Monument attracting official interest in the past have been Lepidoptera—notably the Island Marble sub-species, *E. ausonides insulanus*, extirpated from Cattle Point seven years ago—our research suggests that the most important vertebrate use of Monument habitats may be summer foraging and over-wintering by bats, including three federal Species of Concern: *Corynorhinus townsendii*, *Myotis evotis*, and *Myotis volans*. We have acoustically recorded all three SOC on or near the Monument parcels on south Lopez. Recordings by BLM biologist Nancy Williams at these parcels in 2014 are consistent with ours. Williams also recorded bat passes at Patos Island, a discovery that merits further investigation.

If the islands’ bats over-winter in woodlands, dispersed and periodically active, it could mean that large relatively undisturbed tracts of forest—such as Chadwick, Colville, and much of Iceberg Point—may play a very important role in the survival of bats over a

large part of the county. Further study is warranted, not only bats' winter distribution and activity cycles, but also the nature and source of the prey field available to winter bats.

Kwiaht recorded bat calls in December, January, February and March at a number of woodland and wetland locations on Lopez in 2013-2014, and we installed a permanent woodland "listening post" (stationary Wildlife Acoustics SM3BAT ultrasound recorder) on Entrance Mountain, Orcas, in December 2014, that have demonstrated that in the San Islands, bat activity continues year-round. In winter, bats appear to disperse and to make greater use of woodlands (where moths continue to emerge in winter), much like some of the islands' insectivorous birds e.g. Winter Wrens, Pine Siskins, and Kinglets.

We note that the putative "Shaw Island Vole" sub-species (*Microtus townsendii pugeti*) is currently listed as a federal candidate. This is highly questionable taxonomy, based on eight specimens collected in the islands 75 years ago. Kwiaht has examined a large number of cat-kill and road-kill specimens over the years, and found that their mean morphometry perfectly matches the diagnostic criteria for the parent species. Of course, it is possible that the San Juan County populations of *M. townsendii*, dispersed as they are over dozens of islands, may include genetically distinct albeit cryptic types.

Voles thrive on National Monument lands including many small islands, and they are at risk mainly from raptors, rather than human disturbance. While genotyping would be interesting science, limited resources might be better allocated to wildlife that is truly at risk of extirpation from the islands generally or the Monument in particular.

No attention has been accorded Townsend's Chipmunk (*Neotamias townsendii*), for example, although they are restricted to a single island in the archipelago (Lopez) and are found at Iceberg Point, Colville and Chadwick. They are at least as likely to represent a genetically isolated founder population as the voles, and they appear to be considerably less abundant. Population stability or trends are unknown.

Significant gaps in our knowledge of biogeography in the islands remain. Reptiles are particularly poorly studied. Thus far we have only observed two snakes, *Thamnophis ordinoides* (Northwestern Garter) and *Thamnophis elegans vagrans* (Western Wandering Garter) in the Monument. Both are present on the south end of Lopez. We have also seen *T. elegans vagrans* several times on small islands—not surprising as it is well adapted to swimming and hunting in water.

Northern Alligator Lizards (*Elgaria coerulea*) are present on Orcas Island but not on any Monument properties as far as we are aware. Western Painted Turtles (*Chrysemys picta*) are widespread in the islands although presumed to be introduced; associated with open water lakes and large ponds, they might be attracted to Chadwick marsh but we are not aware of any reports of them there. Chadwick marsh has a large population of Rough-Skinned Newts (*Taricha granulosa*), which are widespread and abundant in the islands.

Lopez has a unique isolated population of Northwestern Salamander (*Ambystoma gracile*) in the Lopez Hill-Davis Bay watershed, but none have been reported from lands of the Monument. However, we have one reliable sighting a decade ago of Western Toad (*Bufo boreas*) on Chadwick Hill. This amphibian has been declining throughout its range and should be considered sensitive and significant if confirmed on south Lopez. Since its

survival depends on the integrity of home ponds used seasonally for reproduction, key to its protection is locating these ponds.

Although the Monument does not extend legally into the marine environment, its biological connections with nearshore ecosystems are considerable, and should be taken into account in management. In particular, our long-term monitoring of nearshore waters adjacent to the Iceberg, Colville, Watmough, and Chadwick parcels on Lopez since 2008 have found exceptionally high numbers of Marbled Murrelets, Minke whales, Orcas, and juvenile Chinook salmon foraging along this coastline. We have also observed and filmed very large aggregations of Pacific Herring working their way along this coastline, directly below cliffs and bluffs; and very large aggregations of Pacific Sandlance in our seines in Watmough Bight—often more than 20,000 Sandlance in a single seine set. Observations by our seabird monitoring team and gut-contents analyses by our salmon food-web team indicate that Chinook and seabirds are pursuing the same prey: Herring and Sandlance.

A complete seabird species list for the south shores of Lopez is available on our project website, <http://www.icebergpointproject.org>, and a six-year summary of salmon and forage fish data from Watmough Bight is available on request as a technical paper. We believe that these waters are the principal early marine nursery for Puget Sound ESU Chinook in the San Juan Islands, a view I believe is now shared by our collaborators at NOAA's Northwest Fisheries Science Center and the Salish Sea Marine Survival Project.

Human activity in the terrestrial environment can influence marine ecosystems in a number of ways. Loss of vegetation, increased runoff and erosion of sea bluffs elevates turbidity in nearshore waters. Changes in shoreline vegetation affect the composition and abundance of floating insects that feed Chinook salmon when forage fish are unavailable. Use of herbicides or fire to manage the terrestrial landscape may have the largest effects. Runoff from treated areas is enriched in toxics, nutrients, and particulates. Nutrients are a growing concern in the San Juan Islands due to evidence of earlier, larger, more frequent harmful algal blooms in recent years. A fish-killing *Heterosigma* bloom covered most of the inside waters of San Juan County in July 2014, including the waters around a number of Monument islands including Skull Island, Blind Island, Indian Island and Twin Rocks.

Access to, and use of beaches is a particular concern in shallow vegetated waters where salmon and seabirds are foraging and resting. We have observed a large increase in boat activity at Watmough Bight since 2010, mainly powered boats, including anchoring, and landing on the beach. Disturbance of seabirds and salmon foraging in the bay may be negligible at current levels of activity, but may become significant if boating continues to increase. We have insufficient evidence to establish what is a safe number of powerboats or horsepower in this small bay.

Submerged rock piles and boulder fields around small Monument islands such as Twin Rocks, Rabbit, the King islands and Kanaka Bay islands, as well as the rocky reefs below Chadwick Hill, Colville and Iceberg Point, are all excellent rockfish (*Sebastes spp*) habitat. We have filmed rockfish populations in the reefs at Iceberg and Twin Rocks with ROV technology. Upland management may affect environmental conditions within these submerged habitats as well.

Seabirds nest on a small number of Monument islands. Lummi Rocks hosts a very large Glaucous Winged Gull rookery. Black Oystercatchers were observed on rocks and

some of the smaller vegetated islands, as well as Indian Island, where our volunteers have monitored a single pair, and diverted visitors from the nesting area, since 2010. On small islands we often found evidence of marine-adapted River Otters, and saw Harbor Seal and Sea Lion pups. Careful attention should be paid to differences, as well as similarities among the islands comprising the Monument.

Management strategies

Many small islands in the Monument are rarely visited. Other parcels, notably the south Lopez coastal properties and Indian Island, attract thousands of visitors every year. Some parcels receive relatively few annual visitors—perhaps 25 to 250—but are so small and sensitive that they are more at risk than larger parcels, or have been more damaged in the past. Skull Island, Reeds Bay Island and Lummi Rocks are examples of extraordinary culturally influenced meadows that have survived because they see few visitors. Freeman Island and Victim Island experience moderate seasonal wear—hundreds of children from nearby summer camps—ranging from deep trail indentations to widespread weeds. Blind and Posey islands have developed campgrounds with widespread ground disturbance, and extensive Eurasian grass lawns, albeit Blind retains one patch of camas on anthropogenic soil that urgently requires protection.

Very few of the smaller, unimproved islands show much evidence of visitors. One exception is “Little Mac” (McConnell Rock), where there has been significant camping and weeds. However, we must assume that the establishment of the Monument, and federal and local promotion of its recreational use, will result in more unsupervised public visits to the smaller islands and we believe this needs to be monitored carefully. At some stage restrictions will likely be necessary for the protection of coastal meadows, cultural remains, and seabirds.

Patos Island is sharply divided between developed and largely unvisited portions. Growing recreational use of the anchorage, campsites and lighthouse on the west end of Patos will eventually result in an increase in “bushwhacking” and informal trails into the interior, and walking the beach and rocks to the Toes on the east end of the island, which thus far retains relatively intact woodlands and wetlands, as well as shell middens, coastal wildflower meadows including the largest *Lilium columbianum* occurrence in the county, seal haul-outs and a sea lion nursery.

The following recommendations are most applicable to coastal parcels and islands that are already popular as recreational destinations notably Iceberg, Colville, Watmough, Chadwick, Indian Island, Blind Island, and at least parts of Patos.

Trails should be clearly designated on signage and marked on the ground. Natural materials such as driftwood, crushed shells, and pebbles should be used to mark the edges or threads of trails discretely in keeping with the aesthetics of coastal meadows and bluffs in the Monument. Continuous loop trails should be preferred to trails that “dead end” and invite hikers to extend them. Clearly visible trails are essential for guiding visitors around (and if possible, never through) fragile habitats. In seven years of stewardship activities at Indian Island observing and speaking with thousands of visitors, we saw high compliance with “stay on trail” markers as long as it was very clear what was a trail and what was not

a trail. We believe it is also important to explain clearly to visitors, on signage, why trails are needed, i.e., to preserve particular kinds of fragile habitats.

Bicycle racks and informational signs are crucial at all points of pedestrian entry. The longstanding (and still growing) popularity of bicycle touring, especially on Lopez, means that a large number of visitors to the Monument's large coastal parcels will arrive on bicycles. They need a clear message and convenient, secure space to leave their bikes while they explore the Monument on foot.

Laminated printed maps and visitor information cards should be available on the small islands accessible only by boat, in easily-recognized but small, discrete watertight boxes at landing points. In our experience conducting the surveys of over 40 Monument islands in 2010-2011, many islands had no identifying markings on maps or the ground, and several were erroneously marked as state, university, or private lands. When boaters land on a small, relatively undisturbed island such as Reads Bay,¹ Rabbit, Twin Rocks or Skull, they should immediately recognize a small box that contains details on the site as a part of the Monument, and refers to fragile habitats, trails, and LNT principles.

Camping and fires should be prohibited except within designated campsites and fire rings. Most of the small Monument islands are severe fire risks, with naturally down dead timber, a buildup of herbaceous detritus, and areas of dry, well-drained slopes. The adverse impact of a wildfire on lichens, mosses, and small islands' ancient junipers, yews and Garry oaks would be severe and long lasting. Campsites invite pit toilets, fire pits and other ground disturbance that is inconsistent with cultural features on small islands. Most informal campsites we have encountered on small islands were located in moss meadows because they are naturally soft substrates, but unfortunately they are also fragile. Existing designated campsites e.g. on Patos, Posey and Blind islands can be maintained, improved and promoted but should remain within already-disturbed portions of those islands.

We recommend on-line registration forms and specific guidelines for large groups visiting any part of the Monument for any purpose, as an opportunity to familiarize group leaders with parcels' trails and fragile habitats as well as applicable LNT principles—and to ascertain whether supervision by BLM staff or a local partner should be arranged. This is particularly important on small, relatively undisturbed islands, where a large group has nowhere to go except off trails. We suggest defining a "large group" as eight or more in a party on islands accessed by boat (but including Indian Island) and 12 or more on coastal parcels (south Lopez, but including Kellett Bluff on Henry Island).

We further recommend that no research activity be permitted, in the Monument or requiring access through the Monument, without on-line registration of the objectives and the methods to be employed; and a public presentation of the findings within two years of the commencement of the study. Registration information and contacts should be publicly accessible on-line, and the presentation of results should be arranged on the nearest ferry-connected island or islands to the research (e.g., on Orcas for Victim, Skull, or Freeman). Any registration of a new research project on a Monument parcel should be copied to all researchers that have already begun registered research on the same parcel, as a means of

¹ There is some confusion over the name of this island. Two Native American families, the Reeds and the Browns, lived on southern Decatur and had a shipyard there a century ago. We believe the bay and island were named for the Reeds that lived nearby.

avoiding duplicative or conflicting research activities, such as one team collecting species that another team is observing and monitoring in the field.

Weed suppression within the Monument should only be pursued where the spread of a weedy or invasive species is encroaching on fragile habitats or sensitive native plant species. Weed removal, even if it involves low-disturbance methods such as cutting seed heads or cutting stems at ground level, necessarily involves some surface disturbance by the people involved, and enough soil scuffing and soil exposure to invite colonization by other weedy species. Before planning removal activity, it should be clear that more harm will result from inaction than from placing work crews on a relatively undisturbed island. Care should be taken that crews empty pants cuffs and brush down shoes before arriving, and again before departing target islands, so that weed removal itself does not become a vector for dispersing weed seeds. This guideline must apply to youth crews as much as to professionals and adult volunteers.

Woody succession is the most urgent landscape management challenge facing the Monument on its larger coastal parcels, Iceberg and Colville. Native American gardening used hoeing, weeding, and occasional light flashy fire to suppress woody species on these coastal bluffs and meadows for a thousand years or more, followed by a century of sheep raising that maintained open space at the expense of introducing highly invasive Eurasian grass species. Removal of sheep in the 1980s triggered a rapid expansion of Douglas firs seaward that is continuing. We have observed that forest expansion is facilitated by, first, a buildup of dead down tall Eurasian grasses. Under this grass thatch, trailing blackberry, snowberry, and Nootka rose spread and thrive, eventually forming thickets that shade out native herbaceous plants—the iconic wildflowers of these parcels. Douglas fir seedlings sprout under the young shrub layer, and eventually grow through it. Experimentally, we have found that herbaceous bulbs and corms survive under the growing woody canopies for only 5-10 years. Approximately one-half of the wildflower meadows that we mapped and photographed at Iceberg in 2004 have disappeared in the intervening 10 years. Unless BLM and the Lopez community are content with losing the remaining wildflower patches by 2025, a systematic program of arresting and perhaps reversing woody encroachment at Iceberg and Colville should begin immediately.

In this context, we think it is important to bear in mind that some habitat types are becoming rare outside of the Monument, and are at risk of disappearing due to succession as well as human activity inside the Monument. In nature, succession turns over habitats continually. A coastal meadow may disappear into an encroaching forest at one place, but somewhere nearby a forest fire or windstorm re-opens the tree canopy and a new meadow forms. In the real world as it is today, human activity restricts succession. As more homes and roads are built, fewer acres of land can ever become meadows; and there is a net total loss of meadows over time due to the combination of continuing development and natural succession. This makes it necessary to preserve meadow-associated species by preventing the remaining meadows on public lands from disappearing as well.

Eurasian grass encroachment is also an urgent issue, not only on the Lopez bluffs but also at Kellett Bluff, where grasses have displaced native herbaceous plants from the major part of the landscape, and on a smaller scale, portions of many of the islands. It has been misleading for conservationists to describe our island meadows as “grasslands”. For most of the San Juan Islands historically, an undisturbed treeless landscape consisted of a

predominantly herbaceous community with probably less than 10 percent native grasses such as Idaho fescue or California oat grass (*Danthonia*), growing through a lichen-moss carpet. Island landscapes only became grassy as a result of raising sheep over the last 150 years. “Restoring” coastal meadows by planting native grasses has no historical scientific basis and can accelerate the disappearance of native wildflowers that do not compete with non-native grasses, such as camas, chocolate lilies, and brodiaeas. Genuine restoration would begin by mowing Eurasian grasses in mid- to late summer when most of our native wildflowers have gone dormant, and infilling with native herbaceous seeds and bulbs.

We strongly recommend that no biocides be employed in landscape management within the Monument because of the proximity of the sea and nearshore habitats used by Chinook salmon, rockfish, seabirds such as Marbled Murrelets, and marine mammals that include Orcas and Minke whales. Based on our observations of thousands of flower visits by insects in 2011-2015, moreover, we can state with confidence that native bees account for 98 percent of wildflower pollination within the Monument. This includes bumblebees (*Bombus* spp) as well as Andrenidae, Megachilidae, and Halictidae. Native bees nest in shallow tunnels, in soil or dead wood. Ground disturbance, removal of woody debris and the use of biocides (including, demonstrably, glyphosate and some other herbicides) have all been shown to reduce native bee populations significantly. BLM efforts to stabilize or restore herbaceous coastal meadows in the Monument will be self-defeating if they spray biocides that kill the local native bees upon which native flower rely for pollination.

Heavy machinery and fires should also be avoided in landscape management here. Compaction by large vehicles such as mowers kills ground-nesting bees, and grasses may recover more quickly from compaction than native herbaceous species. Heavy treads and wheels also scarify the ground surface, often spreading weed seeds and re-planting them. Removal of woody species should, wherever possible, be accomplished by hand focusing on younger shrubs and trees where there may still be a viable native bank of seeds, bulbs and corms hidden beneath them. This recommends working around the edges of wooded patches, removing individuals that are under 5-10 years old. If older, larger trees are to be removed, we recommend girdling them first to allow the canopy to die back slowly over a few years before the trunk is removed. Uncovering large patches of long-shaded soil at once is an invitation to wind-blown seeds from nearby weedy areas.

Prescribed burning has grown popular over the past 25 years as Northwest public lands managers and conservationists recognized the key role of fire in Native American-managed landscapes of the past. In fact, we have collected abundant evidence—mainly as soil profiles and fire-scar dendrochronology—that Native peoples lit relatively small fires on the south end of Lopez, at Kellett, and on many of the small Monument islands, about every 5-10 years. The ethnographic, dendrological and geochemical evidence supports a fire regime in which each family garden plot, a fraction of an acre in size, was burnt with a light load of mainly herbaceous fuel when the family owners considered it convenient. Correlation of fire scar dates from surviving ancient trees is inconsistent with fires larger than about an acre, and fire scars are so light that they are difficult to identify. Conditions have changed significantly since fire was used as a tool for managing woody succession in island landscapes. Settlers introduced pyrophilic perennial Eurasian grass species that benefit from frequent burning. More recently, islanders have allowed large parts of their landscape to re-forest; arguably, more of San Juan County is forested in 2015 than at any

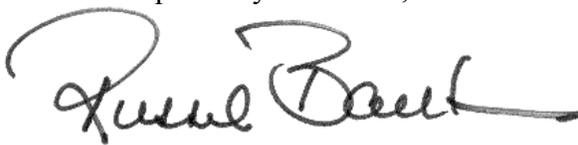
time in the last 2,000 years. With the spread of pyrophilic weeds and mature forests, fires today will burn much hotter and longer than Native American fires, killing native corms, bulbs and seeds, while promoting re-colonization by Eurasian grasses. We recommend, in the strongest possible terms, that prescribed burns *not* be carried out in the Monument.

We do believe that it would be useful to recreate and experimentally conduct very small, flashy burns—more like the occasional clearing of Native gardens centuries ago—in combination with mowing, mulching, and re-seeding with wildflowers such as camas. Experiments of this nature should not be conducted inside the Monument, however, but on private lands that are comparable in geochemical conditions, history, and vegetation to Monument properties.

Monitoring is imperative to assure that management objectives are met, to refine management strategies, and to recognize and respond to unexpected changes in managed landscapes. In the islands, the impacts of growing human activity and climate change are overlapping and difficult to disentangle without well-conceived systematic data gathering and analysis. Local organizations are indispensable for acquiring data at the scale, detail, and frequency required. Volunteers must be properly trained and supervised, however, or the data they collect will be of doubtful and largely unknowable quality. We believe that community volunteers thrive and collect reliable data, when they are treated like graduate students, i.e., provided with sound basic technical training (especially taxonomy) as well as ongoing training upgrades; challenged by new tasks that pique their curiosity; directly involved in designing research protocols and in analyzing data; and held to high technical standards. The Monument should expect and accept nothing less than scientifically sound local monitoring; and will be more credible in the community for having done so.

At the same time, we strongly recommend that the Monument give preference, in the distribution of monitoring tasks, to islanders and island organizations. High standards do not imply turning to universities or commercial contractors on the mainland. They do not necessarily do more accurate work, more efficiently, than islanders—and they tend to lack the credibility and transparency that island communities expect. Local knowledge of landscapes and species can enrich monitoring and make it more economical. At Kwiaht, we have frequently been asked by mainland environmental contractors to describe island ecosystems, provide species lists, and share trend data, so that contractors can look good and get paid. We suggest that monitoring and analysis be carried out collaboratively with local organizations, and that specialized expertise, if required, be recruited to work with local organizations rather than independently.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Russel Barsh". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Russel Barsh
Director

Table A: State sensitive plants in the National Monument

Species		Occurrences elsewhere in:				In the Monument	
Scientific name	Common name	Notes	SJC	Sound	WA	Where	Habitat
<i>Lepidium oxycarpum</i>	Sharp-fruit peppergrass	1	No	No	No	Cattle Point	Salt spray zone
<i>Ranunculus californicus</i>	California buttercup	2, 6	Yes	No	No	Iceberg Point	Cultural meadow
<i>Isoetes nuttallii</i>	Nuttall's quillwort		No	No	Yes	Cattle Point	Vernal pools
<i>Seriocarpus rigidus</i>	White-topped aster		No	1	Yes	Iceberg Point	Cultural meadow
<i>Oxytropis campestris gracilis</i>	Slender crazyweed	4	No	1	Yes	Iceberg Point	Salt spray zone
<i>Triodanis perfoliata</i>	Venus' looking glass	3	No	Yes	Yes	Rabbit Island	Coastal meadow
<i>Arctostaphylos uva-ursi</i>	Kinickinick	5	No	Yes	Yes	Patos, Eliza, Lummi	Woodland slopes
<i>Polemonium pulcherrimum</i>	Showy Jacob's ladder	2	1	Yes	Yes	Iceberg Point	Rock outcrops
<i>Perideridia gairdnerii</i>	Yampah, Indian carrot	2	<5	Yes	Yes	Iceberg Point	Cultural meadow
<i>Campania rotundifolia</i>	Hare bell		<5	Yes	Yes	Colville, Watmough, and Lummi Rocks	Rock outcrops
<i>Lupinus microcarpus</i>	Chick lupine	2, 5, 6	Yes	Yes	Yes	Iceberg Point	Cultural meadow
<i>Opuntia fragilis</i>	Brittle prickly pear	2	Yes	Yes	Yes	Iceberg Point	Coastal meadow

1: Last recorded 1992, possibly extirpated

2: Largest occurrence in the San Juan Islands

3: Recorded on Stuart Island in 1984 and several other islands in 1910s-1920s

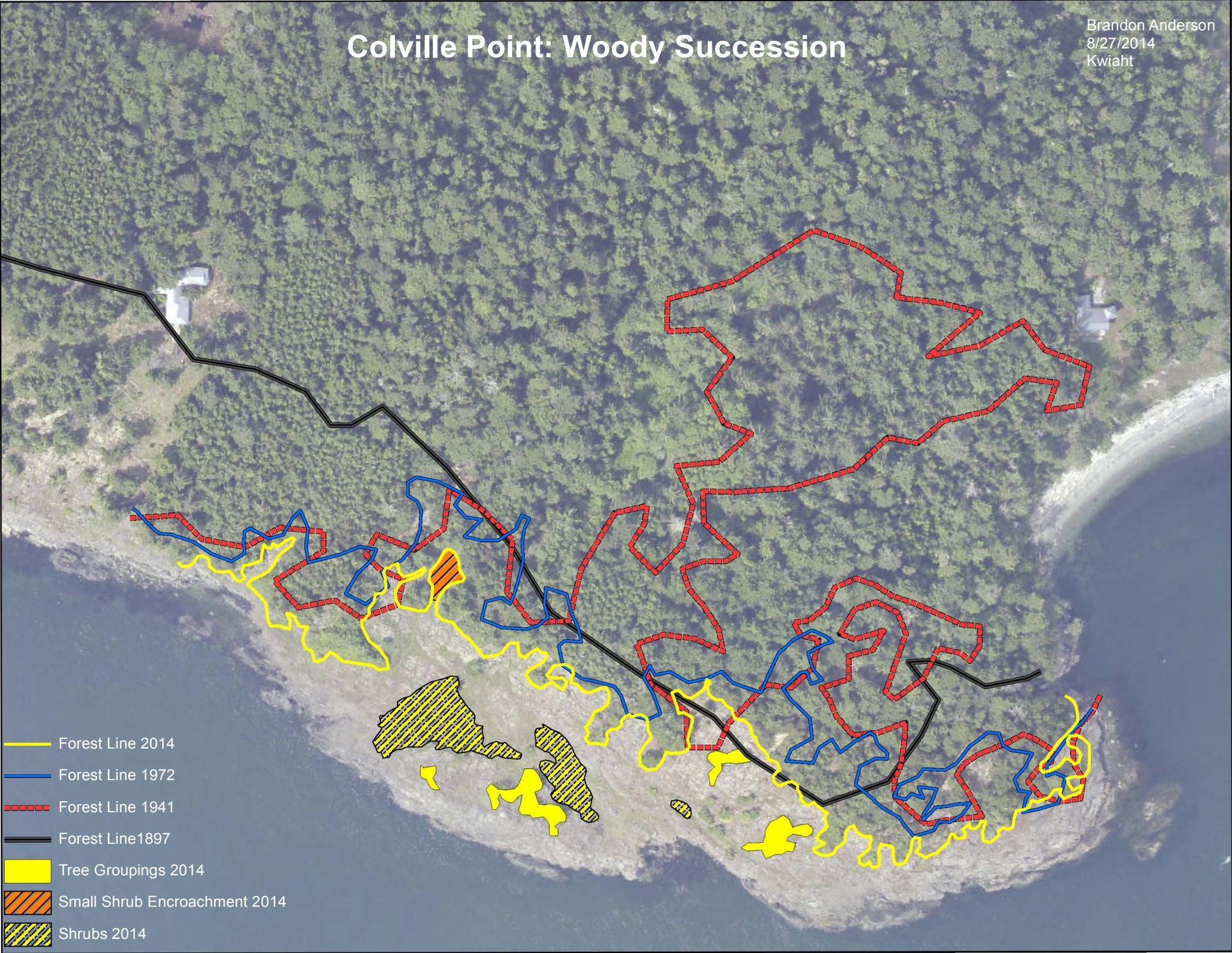
4: Also recorded only from Jefferson County and one county in eastern Washington (Okanogan)

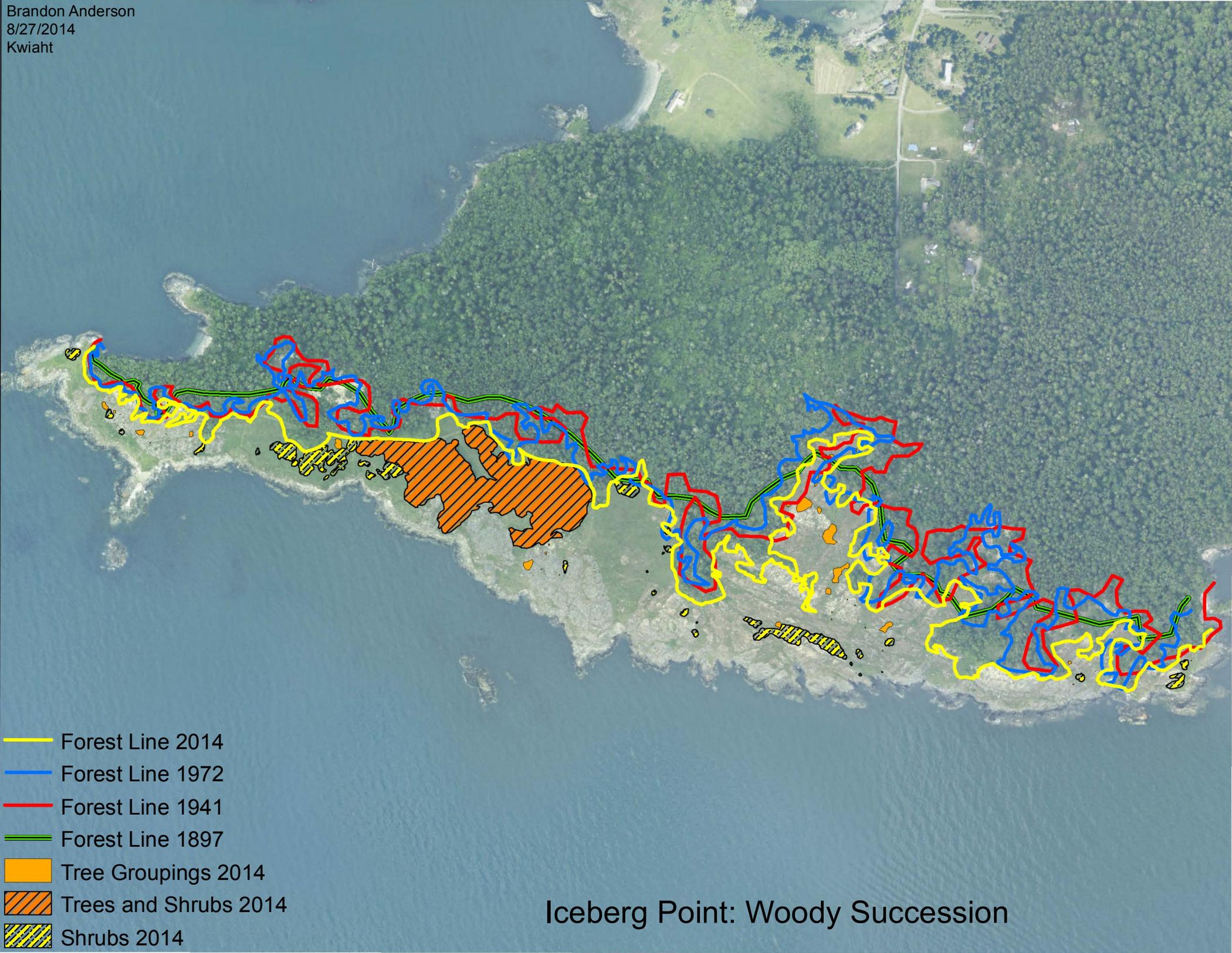
5: Reported only from one other Washington county (Yakima)

6: Red-listed as Endangered in Canada

Colville Point: Woody Succession

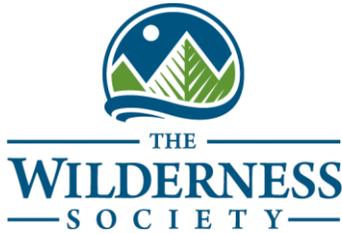
Brandon Anderson
8/27/2014
Kwiaht





- Forest Line 2014
- Forest Line 1972
- Forest Line 1941
- Forest Line 1897
- Tree Groupings 2014
- Trees and Shrubs 2014
- Shrubs 2014

Iceberg Point: Woody Succession



April 1, 2015

Ms. Lauren Pidot
San Juan Islands National Monument
P.O. Box 3
Lopez, WA 98261
blm_or_sanjuanislandsnm@blm.gov

**Re: Scoping for San Juan Islands National Monument Resource Management Plan
and Environmental Impact Statement**

Dear Ms. Pidot:

Please accept and fully consider these scoping comments for the San Juan Islands National Monument (Monument) Resource Management Plan (RMP) and Environmental Impact Statement (EIS). The Wilderness Society cares deeply about the future management of the Monument and look forward to working cooperatively with the BLM to conserve, protect and restore the natural and cultural resources for current and future generations. We appreciate this opportunity to comment and appreciate the Bureau of Land Management’s commitment to addressing the circumstances and values related to management of the public resources within the Monument.

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I. GENERAL MANAGEMENT CONSIDERATIONS

A. Protection of the Monument objects must be the primary objective

The Federal Land Policy and Management Act (FLPMA) requires BLM to manage public lands under multiple use principles unless an area has been designated by law for specific uses, in which case BLM must manage the land for those specific uses. 43 U.S.C. § 1732(a). In other words, BLM will manage national monuments not under the FLPMA multiple use mandate, but rather under the Proclamation that established the San Juan Islands National Monument. This is expressly provided for in FLPMA itself:

The Secretary shall manage the public lands under the principles of multiple use and sustained yield, in accordance with the land use plans developed by him under section 1712 of this title when they are available, *except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law.*” FLPMA, 43 U.S.C. § 1732(a) (emphasis added).

Pursuant to the legal authority granted by Congress in the Antiquities Act of 1906 (16 U.S.C. §§ 431-433), the President designated the San Juan Islands National Monument for the explicit purpose of protecting and preserving identified historic and scientific objects. Accordingly, the standard approach to multiple use management does not apply to this monument, and any effort to adopt such a management approach to the detriment of its natural and cultural objects and values would be in violation of the Proclamation and the mandates of FLPMA. BLM must manage the Monument for the protection and preservation of its natural, cultural, historic and scientific values, and only allow uses other than those needed for protection of monument objects when those uses do not conflict with the directives of the Proclamation.

Because of its significance, which merited designation as a National Monument and inclusion in the National Landscape Conservation System (National Conservation Lands), the Monument requires different management from other BLM lands. The designation of National Monuments, together with the establishment of the National Conservation Lands themselves, represents the cornerstone of a new era in land stewardship, in which BLM focuses on a mission of stewardship to: “conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.” 16 U.S.C. § 7202 (2009).

Secretarial Order 3308 speaks to the management of the National Conservation Lands. The Order states in pertinent part that “[T]he BLM shall ensure that the components of the [National Conservation Lands] are managed to protect the values for which they were designated, including, where appropriate, prohibiting uses that are in conflict with those values.” The Order also requires the incorporation of science into the decision-making process for the National Conservation Lands, stating, “[s]cience shall be integrated into

management decisions concerning [National Conservation Lands] components in order to enhance land and resource stewardship and promote greater understanding of lands and resources through research and education.” The 15-Year Strategy for the Conservation Lands reinforces this by stating the “conservation, protection, and restoration of the [National Conservation Lands] values is the highest priority in [National Conservation Lands] planning and management, consistent with the designating legislation or presidential proclamation.” National Conservation Lands Strategy at 8.

The most important aspect of this RMP is ensuring that the objects that these areas were designated to protect are conserved, protected and restored over the life of the plan. While discretionary uses may be allowed to continue if compatible with that charge, BLM must limit or prohibit such uses if they are in conflict with the values that the areas were designated to protect.

B. Landscape-level management and coordination

Secretarial Order 3308 states that the National Conservation Lands “shall be managed as an integral part of the larger landscape, in collaboration with the neighboring land owners and surrounding communities, to maintain biodiversity, and promote ecological connectivity and resilience in the face of climate change.” BLM’s 15-Year Strategy for the National Conservation Lands discusses utilizing large-scale assessments, such as BLM’s Rapid Ecoregional Assessments (REA), to identify how to connect and protect resources at the landscape-level. BLM does not have an REA or similar document to rely on for this information at this time. However, BLM may still do an ecoregional assessment with existing data for areas around the Monument. This would include working in cooperation with the other federal agency managers, state agencies, the North Pacific Landscape Conservation Cooperative, Northwest Climate Science Center, and other entities to quickly evaluate development, impacts, movement, and conditions at a landscape-level.

Landscape-level planning and management also requires coordination among agencies, governments, tribes and stakeholders. Goal 2B of the 15-Year Strategy for the National Conservation Lands provides that BLM will: “Adopt a cross-jurisdictional, community-based approach to landscape-level conservation planning and management.” This means coordination not just on ecoregional assessments and planning, but also on day-to-day management.

C. Direction for new Monuments and Monument Management Plans

BLM has policy guidance for newly-established National Monuments. BLM Manual 6220 specifically provides that upon the designation of a new Monument, BLM must, in pertinent part:

- Review policies and governing resource management plans for consistency with the designating legislation or proclamation.

- Subject to valid existing rights, and in accordance with applicable law and regulation, consider suspending or modifying discretionary uses and activities incompatible with the designating legislation or proclamation pending completion or amendment of a land use plan.
- Initiate inventories of the objects and values for which the Monument or NCA was designated.

(BLM Manual 6220 at 1.6(D)).

Additionally, BLM Manual 6220 states that BLM Monument management plans must:

- Clearly identify Monument and NCA objects and values as described in the designating proclamation or legislation; where objects and values are described in the designating legislation or proclamation only in broad categories (e.g. scenic, ecological, etc.), identify the specific resources within the designating area that fall into those categories;
- Identify specific and measurable goals and objectives for each object and value, as well as generally for the Monument or NCA;
- Identify management actions, allowable uses, restrictions, management actions regarding any valid existing rights, and mitigation measures to ensure that the objects and values are protected;
- Provide, to the extent possible, a thorough quantitative analysis of the effects of all plan alternatives on the objects and values;
- Where a thorough quantitative analysis is not possible, provide a detailed qualitative analysis of the effects of all plan alternatives on the objects and values;
- Consider designating Monuments and NCAs as ROW exclusion or avoidance areas;
- Include a monitoring strategy that identifies indicators of change, methodologies, protocols, and time frames for determining whether desired outcomes are being achieved

With regards to identifying and analyzing Monument objects and values, we recommend that BLM consider using the approach used in the Sonoran Desert National Monument (SDNM) RMP. The SDNM RMP specifically identified the Monument objects and values (SDNM Proposed RMP at 1-18 to 1-21) and a methodology for analyzing impacts to those objects and values (SDNM Proposed RMP at 4-543) Finally, BLM came up with a separate methodology for determining adequate protection of those objects and values (SDNM Proposed RMP at Appendix S, S-4 to S-6).

Recommendation: BLM’s recently released Manual 6220 to provide guidance on National Monuments. This policy includes obligations to clearly identify and inventory monument objects, identify measureable goals and objectives for each object and value, extensive analyses, ensure consistent management with protecting objects and values, and others identified above. This planning process should consider the example for identifying, evaluating impacts and protection of Monument objects set forth in the RMP for the Sonoran Desert National Monument.

II. LANDS WITH WILDERNESS CHARACTERISTICS

BLM Manuals 6310 and 6320 reiterate the BLM's obligations from the Federal Land Policy and Management Act ("FLPMA") to maintain a current inventory of lands with wilderness characteristics (LWCs), and to consider managing those lands for protection of those qualities. They also outlined the characteristics areas must have in order to be identified as LWCs, and how the agency is to evaluate such criteria. The manuals state that wilderness inventories are to be done on a *continuing* basis and relevant citizen-submitted data must be evaluated (BLM Manual 6310.04 (C)(1)). Additionally, the manual notes that, "*regardless of past inventory, the BLM must maintain and update as necessary, its inventory of wilderness resources on public lands*" (BLM Manual 6310.06 (A)) (emphasis added).

The 15-Year Strategy for the National Conservation Lands emphasizes managing the Conservation Lands as part of the larger landscape, with a goal to "identify and protect lands that are critical to the long-term ecological sustainability of the landscape" (Strategy, p. 13). Wilderness inventories are specifically identified as assessments that should be utilized to inform planning and help BLM achieve this goal. Therefore, an updated and comprehensive LWC inventory for the San Juan Islands National Monument is an important part of this planning process.

Management of lands with wilderness characteristics should be prioritized in the San Juan Islands National Monument, which was designated to protect a wide range of natural and cultural resources. Manual 6320 require BLM to "[c]onsider the benefits that may accrue to other resource values and uses as a result of protecting wilderness characteristics" in land use planning processes. Those potential benefits should influence BLM's decision to protect inventoried LWCs as part of its overall purpose of conserving Monument objects. There are numerous values associated with lands with wilderness characteristics which BLM is required to manage in compliance with the Monument proclamation and the agency's management policies for the National Conservation Lands, and which would be benefited by management decisions to protect LWCs:

- a. Wildlife habitat and riparian areas – FLPMA acknowledges the value of wildlife habitat found in public lands and recognizes habitat as an important use. 43 U.S.C. § 1702(c). The Monument Proclamation also recognizes diverse ecological systems as a primary purpose for the Monument designation. Due to their unspoiled state, lands with wilderness characteristics provide valuable habitat for wildlife, thereby supporting additional resources and uses of the public lands. As part of their habitat, many species are also dependent on riparian and other wetland habitats, especially during either seasonal migrations or seasons and years when surrounding habitats are dry and unproductive. Wilderness quality lands support biodiversity, watershed protection and overall healthy ecosystems. The low route density, absence of development activities and corresponding dearth of motorized vehicles, which are integral to wilderness character, also ensure the clean air, clean water and lack of disturbance necessary for productive

wildlife habitat and riparian areas (which support both wildlife habitat and human uses of water).

- b. Cultural resources – The Monument proclamation identifies and details a collection of cultural and historic resources as a primary purpose for the Monument. The lack of intensive human access and activity on lands with wilderness characteristics helps to protect these resources.
- c. Scenic values – FLPMA specifically identifies “scenic values” as a resource of BLM lands for purposes of inventory and management (43 U.S.C. § 1711(a)), and the unspoiled landscapes of lands with wilderness characteristics generally provide spectacular viewing experiences. The scenic values of these lands will be severely compromised if destructive activities or other visual impairments are permitted.
- d. Recreation – FLPMA also identifies “outdoor recreation” as a valuable resource to be inventoried and managed by BLM. 43 U.S.C. § 1711(a). Lands with wilderness characteristics provide opportunities for primitive recreation, such as hiking, camping, boating and wildlife viewing. Primitive recreation experiences may be foreclosed or severely impacted if the naturalness and quiet of these lands are not preserved.

A National Monument designation is an excellent opportunity to ensure every piece of wilderness-quality land is preserved for future generations. The National Monument will draw visitors from all over the country and world who want to see its natural beauty, and it makes sense to maximize protections for its pristine portions.

Typically, lands with wilderness characteristics are comprised of roadless areas over 5,000 acres of contiguous BLM land. However, as BLM Manual 6310 for wilderness inventory states, BLM should also look at roadless areas of less than 5,000 acres where any one of the following apply:

a) They are contiguous with lands which have been formally determined to have wilderness or potential wilderness values, or any Federal lands managed for the protection of wilderness characteristics. Such lands include:

- 1) designated Wilderness,
- 2) BLM Wilderness Study Areas,
- 3) U.S. Fish and Wildlife Service areas Proposed for Wilderness Designation,
- 4) U.S. Forest Service (FS) Wilderness Study Areas or areas of Recommended Wilderness, and
- 5) National Park Service (NPS) areas Recommended or Proposed for Designation. They do not include NPS areas merely considered “Eligible for Wilderness Study,” nor do they include FS Roadless Areas unless they are also designated as “Recommended Wilderness” through a Forest Plan Revision.

b) It is demonstrated that the area is of sufficient size as to make practicable its preservation and use in an unimpaired condition.

c) Any roadless island of the public lands.

BLM should inventory areas of the monument for these characteristics and manage the lands it identifies as having wilderness characteristics to protect those characteristics.

Recommendations: While the monument itself is only around 1,000 acres in size, there are other justifications for lands with wilderness characteristics, such as the “roadless island,” that BLM should be inventorying as having wilderness quality and considering protecting as lands managed for wilderness characteristics.

III. VISUAL RESOURCES

It is BLM policy that visual resource management (VRM) classes are assigned to all public lands as part of the Record of Decision for RMPs. The objective of this policy is to “manage public lands in a manner which will protect the quality of the scenic (visual) values of these lands.” BLM Manual MS-8400.02. Under the authority of FLPMA, the BLM must prepare and maintain on a continuing basis an inventory of visual values for each RMP effort. 43 U.S.C. § 1701; BLM Manual MS-8400.06. Specifically, IB No. 98-135 states, “It is the intent and policy of both the Department and the Bureau of Land Management that the visual resource values of public lands must be considered in all land-use planning efforts.”

In addition, NEPA requires that measures be taken to “assure for all Americans . . . aesthetically pleasing surroundings.” Once established, VRM objectives are as binding as any other resource objectives, and no action may be taken unless the VRM objectives can be met. *See* IBLA 98-144, 98-168, 98-207 (1998). The RMP must make clear that compliance with VRM classes is not discretionary.

Recommendation: BLM should inventory and classify the Monument in the context of its new designation status, which is more protective than its previous allocation. BLM should seek additional areas where VRM I designation might be appropriate to conserve Monument objects.

IV. NIGHT SKY RESOURCES

BLM has been given an explicit mandate to manage the lands under its jurisdiction for their scenic and atmospheric values, which includes night skies. *See*, FLPMA, 43 U.S.C. § 1701(a)(8) (stating that “...the public lands be managed in a manner that will protect the quality of the...scenic...[and] air and atmospheric...values...”); National Environmental Policy Act, 43 U.S.C. § 4331(b)(2) (requiring measures to be taken to “...assure for all Americans...esthetically pleasing surroundings...”); National Historic Preservation Act, 36 C.F.R. § 800.1(a) (requiring federal agencies to consider measures to avoid impacts on historic properties, including their “settings”). A dark night sky is

undoubtedly a scenic and atmospheric value within that term's meaning as defined in FLPMA.

Other federal land-use management agencies, such as the National Park Service, have already recognized the importance of this fading resource (See *Managing Lightscapes*, NATIONAL PARK SERVICE (last updated April 20, 2012), (<http://www.nature.nps.gov/night/management.cfm>). While the NPS operates under a different set of legal obligations than the BLM, NPS's Organic Act mandate to "conserve the scenery and natural and historic objects and the wild life therein to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations," Organic Act of 1916 § 1, clearly has parallels to BLM's multiple use mandate in FLPMA to "take into account the long-term needs of future generations...including natural scenic...resources," 43 U.S.C. § 1702(c).

Since 1984, BLM has interpreted its mandate as a "stewardship responsibility" to "protect visual values on public lands" by managing all BLM-administered lands "in a manner which will protect the quality of scenic (visual) values." Visual Resource Management Handbook, H-8400-1(.02), (.06)(A). Night sky management is an inherent component of this responsibility. VRM is not restricted to land-based resources. To this end, BLM should develop minimum management prescriptions to be included in its resource management plan that give due consideration to the value of a dark night sky, consistent with BLM's multiple use mandate, as defined at 43 U.S.C. § 1702(c).

BLM can meet its duty to manage for night sky resources by setting management prescriptions for this important resource in the RMP. For example, the Arizona Strip District incorporated the following prescriptions in the RMPs for the District in 2008:

- Permanent outdoor lighting in VRM Class I areas will not be allowed.
- Impacts to dark night skies will be prevented or reduced through the application of specific mitigation measures identified in activity level planning and NEPA review. These measures may include directing all light downward, using shielded lights, using only the minimum illumination necessary, using lamp types such as sodium lamps (less prone to atmospheric scattering), using circuit timers, and using motion sensors.
- Any facilities authorized will use the best technology available to minimize light emissions.

See Arizona Strip RMP at 65; Grand Canyon-Parashant National Monument RMP at 67; Vermilion Cliffs National Monument RMP at 47-48.

Recommendations: BLM should explicitly include considerations for night skies in the VRM portion of the RMP as well as management prescriptions for night sky protection.

V. NATURAL SOUNDSCAPES

We encourage BLM to evaluate and protect natural soundscapes as part of this planning process. Like viewsheds and air quality, sound is one of the resources of the public lands that is affected by management of agency-authorized uses and can impact other resources as well, such as recreation and wildlife. Soundscape management is especially important in planning for the National Conservation Lands, where resource protection is prioritized over other uses, many of which degrade the natural soundscape (such as energy development and off-road vehicle use). For example, the diversity of bird species present in the San Juan Islands National Monument is described in detail in the Monument Proclamation, including raptors, migrating birds and the endangered southwestern willow flycatcher. These Monument objects draw birdwatchers from near and far to experience the sights and sounds of nature. Preserving the natural soundscape is essential to protecting bird species as well as providing quality recreation experiences for Monument visitors.

As part of providing opportunities for quiet recreation, BLM must consider activities that interfere with the soundscape associated with quiet recreation opportunities. Research shows that for many people, especially quiet recreationists, the primary reason for visiting primitive landscapes is to attain a sense of solitude and tranquility, which are interrupted by non-natural noises. A study performed by psychologists at Colorado State University found that acoustic stressors impact visual landscape quality, meaning non-natural noise actually affects the perceived naturalness of a landscape.¹ Therefore, in order to preserve the naturalness of an area, BLM must preserve the natural soundscape.

Furthermore, the authors of the study note that “tranquility” and “solitude” are explicitly addressed in the Wilderness Act as values that must be preserved by land management agencies. BLM guidance directs the preservation of “naturalness” in Wilderness Study Areas, Visual Resource Management Class I zones, and other areas managed to protect wilderness qualities. All of these values are negatively impacted when the natural soundscape is impacted; therefore, BLM must retain the natural soundscape in wilderness-quality lands and primitive recreation areas.

A. BLM’s Obligation to Preserve Natural Soundscapes

Executive Order 11644 (1972), as amended by E.O. 11989 (1977), orders the BLM to locate areas and trails to

Minimize conflicts between off-road vehicle use and other existing or proposed recreation uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors (emphasis added).

¹ Mace, Britton L., et al., *Aesthetic, Affective, and Cognitive Effects of Noise on Natural Landscape Assessment*, Society & Natural Resources, 12: 225-242, 1999.

BLM regulations at 43 C.F.R. Sec. 8342.1 reiterate this E.O.

In order to effectively and appropriately achieve this goal, the Colorado BLM issued “A Recreation and Visitor Services Strategy” (“Recreation Strategy”) to help field offices provide quality recreation experiences for all users. The Recreation Strategy recognizes that BLM’s obligation to provide recreation areas for many user types requires designation of quiet recreation zones. It defines “quiet recreation” as “Outdoor recreation enthusiasts such as hikers, skiers, mountain bikers, equestrians, bird watchers, hunters and anglers *who seek the opportunity to enjoy natural soundscapes*” (p. 17) (Emphasis added). We encourage the Taos Field Office to similarly implement BLM guidance for minimizing conflict between user groups by establishing quiet use areas and mitigating potential noise impacts on these areas.

Additionally, courts have upheld the responsibility of federal land management agencies to evaluate noise impacts on the natural soundscape. *See Izaak Walton v. Kimbell*, 516 F. Supp. 2nd 982, 985, 995-96 (D. Minn. 2007). (EA prepared by USDA Forest Service for plan to construct snowmobile trail adjacent to Boundary Waters Canoe Area Wilderness failed to properly analyze noise impacts from snowmobile use, as required by NEPA; EA provided no quantitative evidence of analysis of decibel levels to be projected by snowmobile use of the trail into adjoining wilderness.)

B. Effective Soundscape Analysis

In order to effectively preserve the natural soundscape in quiet recreation areas, BLM must quantitatively measure (1) the decibel (dB) levels of the natural soundscape; and (2) ORV dB levels on the natural soundscape. Quantification of ORV traffic volume, duration, and frequency are thus necessary components of soundscape analysis.

There are many tools available to BLM to adequately measure noise impacts and set prescriptions to prevent negative impacts. The Wilderness Society developed a GIS model based on the System for the Prediction of Acoustic Detectability (SPreAD), a workbook issued by the Forest Service and Environmental Protection Agency for land managers to “evaluate potential . . . acoustic impacts when planning the multiple uses of an area.” The Wilderness Society adapted the SPreAD model to a GIS environment so that potential noise impacts could be integrated with other variables being considered in the planning process. We can provide more information in this model to the Taos Field Office at your request. The SPreAD-GIS model can be implemented in your existing ArcGIS software at no additional cost.

BLM should use the SPreAD-GIS model to determine what sounds will impact visitors in each segment of the planning area, and what steps must be taken to mitigate those impacts. It is important to note that the original SPreAD operates under the premise that in primitive recreation areas, *no noise should be audible above the natural soundscape*.

In addition, Southern Utah University has been conducting a baseline acoustic monitoring study of the Grand Staircase-Escalante National Monument. We recommend BLM reach

out to the Grand Staircase for more details on the ongoing soundscape work at that monument.

Recommendations: The preservation of natural soundscapes is important to provide visitors with adequate opportunities for quiet recreation. The USGS finds that dissatisfaction with recreational opportunities can “diminish public support for land-management programs.”² We encourage BLM to utilize the SPreAD-GIS model to analyze and preserve the natural soundscape of the Monument, especially in special management areas managed for quiet use recreation, including recreation management areas and lands with wilderness characteristics. We also encourage BLM to inquire about the ongoing acoustic monitoring study at the Grand Staircase-Escalante National Monument.

VI. CULTURAL RESOURCES

BLM must prioritize cultural resource inventories under the Proclamation and the National Historic Preservation Act. As stated in the Proclamation, “[t]he presence of archaeological sites, historic lighthouses, and a few tight-knit communities testifies that humans have navigated this rugged landscape for thousands of years.” The Proclamation goes on to specify that “[a]rcheological remains of the villages, camps, and processing sites are located throughout these lands, including shell middens, reef net locations, and burial sites. Wood-working tools, such as antler wedges, along with bone barbs used for fishing hooks and projectile points, are also found on the islands.” As stated in Section I(A) above, these cultural resources must be prioritized, along with the other objects of the monument, above all other discretionary uses.

Section 106 of the National Historic Preservation Act (NHPA) requires BLM to take into account the effect of its actions on historic properties. 16 U.S.C. § 470f. Specifically, a federal “undertaking” triggers the Section 106 process, which requires the lead agency to identify historic properties affected by the action and to develop measures to avoid, minimize, or mitigate any adverse effects on historic properties. 16 U.S.C. § 470f; 36 C.F.R. §§ 800.4, 800.6. NHPA regulations provide that an agency “shall make a reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews, sample field investigation, and field survey.” 36 C.F.R. § 800.4(b)(1).

Prior to authorizing a proposed action, BLM must determine whether the proposed action is an undertaking under the NHPA. 36 C.F.R. § 800.3; *Mont. Wilderness Ass’n v. Fry*, 310 F. Supp. 2d 1127, 1152 (D. Mont. 2004). For example, Section 106 review must occur prior to approving the designations of routes in the record of decision since the designation of routes in an RMP is an “undertaking.” BLM’s regulations indicate that

² Ouren, Douglas S., et al., USGS, Environmental Effects of Off-Highway Vehicles on Bureau of Land Management Lands: A Literature Synthesis, Annotated Bibliographies, Extensive Bibliographies, and Internet Resources (2007).

formal designation of ORV routes occur not at the implementation level but with “[t]he approval of a resource management plan. . . .” 43 C.F.R. § 8342.2(b); *see also, Norton v. S. Utah Wilderness Alliance*, 542 U.S. 55, 69 n.4 (2004) (holding the “affirmative decision” to open or close a specific ORV route occurs through land use planning). The *S. Utah Wilderness Alliance* Court’s interpretation is consistent with national guidance from the Interior Department stating that “[p]roposed decisions to designate new routes or areas as open to OHV use . . . are subject to section 106 compliance” (BLM IM 2007-030). Therefore, it is clear that road and route designations made during the land use planning process are undertakings requiring review under Section 106 of the NHPA prior to approval of the resource management plans for Monuments.

There has been recent case law on this topic. In *Montana Wilderness Association v. Connell*, the court held that the BLM violated the NHPA’s “reasonable and good faith” inventory requirement when it adopted the Upper Missouri River Breaks National Monument RMP. Appeal No. 11-35818, 2013 WL 3927754, Slip Op. at 35-45 (citing 36 C.F.R. § 800.4(b)(1)). The court held that BLM’s Class I literature review for the RMP did not amount to a “reasonable effort to identify historical and cultural resources” because “[c]onsistent with BLM’s own policy documents, BLM is required to conduct Class III inventories for roads, ways and airstrips that have not been surveyed previously or were surveyed decades ago.” Slip Op. at 43. The court remanded to the district court to enter an order requiring BLM to conduct Class III surveys. Slip Op. at 45.

Recommendation: BLM should complete Class III cultural resource inventories in the Monument to meet its obligations under the Proclamation and NHPA. This will help to ensure that BLM knows where the cultural resources are to provide the requisite amount of protection under the law.

VII. RECREATION

Recreation is an increasingly prevalent land-use in the Monument. Accordingly, the BLM should incorporate the full range of recreation opportunities into its management objectives. Planning efforts should protect and enhance values essential for quiet recreation alongside other forms of recreation and land-uses.

A. Planning for Recreation and Visitor Services

Past planning efforts highlight the role of visitor surveys and other monitoring data in creating recreation designations. For example, in the Colorado River Valley RMP, the field office collaborated to conduct surveys on the prevalence of recreation users. Survey results determined that hiking, mountain biking, and hunting were the most popular activities throughout the planning area (Colorado River Valley Proposed RMP 3-157). Motorized activities were also determined to be popular throughout the field office, but its extreme popularity was largely concentrated and only in certain communities. *Ibid.* With sufficient understanding of recreation trends and user concentrations, the Colorado River Valley RMP allocated significant tracts of non-motorized recreation management

areas, no open area designations, and limited area designations for off-highway vehicles in the appropriate places.

As another example, the Moab Field Office (Utah) used the National Visitor Use Monitoring Program (similar to Southern Nevada BLM in 2009), and found top recreation activities were “viewing natural features, hiking/walking/trail running, relaxing, viewing wildlife and driving for pleasure” (Moab 2007 NVUM, Table 16). We recognize that these types of surveys and monitoring can be resource-intensive, but dually note that that where recreation monitoring has occurred, data often points to non-motorized recreation activities as significant, if not predominate, uses. In this regard, the lack of recreation analysis in the draft RMP may preclude BLM from striking an appropriate balance between motorized and non-motorized recreation management designations.

B. Recreation Management Areas

We encourage the BLM to designate recreation management areas in the San Juan Islands National Monument RMP to preserve or restore primitive and backcountry recreation opportunities – providing a prescriptive approach to creating, enhancing and protecting quiet recreation experiences in the Monument and thereby providing enjoyable experiences for Monument visitors to appreciate the Monument objects.

In 2010, BLM issued new guidance (IM 2011-004) for recreation and visitor services planning in the land use planning process. The guidance changes recreation management to a three-category system for recreation management areas wherein lands in the planning area can be designated as special recreation management areas (SRMAs), managed as extensive recreation management areas (ERMAs), or classified as public lands not designated as recreation management areas.

Management focus for SRMAs is to “protect and enhance a targeted set of activities, experiences, benefits, and desired recreation setting characteristics,” whereas ERMAs are managed to “support and sustain the principal recreation activities and the associated qualities and conditions of the ERMA.” In SRMAs, recreation is to be the dominant management focus, and in ERMAs management is “commensurate with the management of other resources and resource uses.” Whereas SRMAs are intended for more intensive management, ERMAs may be appropriate to designate for quiet-use, backcountry experiences and layer with other special designations that are compatible with quiet recreation, such as ACECs and lands with wilderness characteristics. Both SRMAs and ERMAs provide mechanisms for the BLM to actively manage different types of recreation to the benefit of users while protecting the other resources of the public lands.

Recommendations: BLM should adopt a range of SRMAs and ERMAs and management prescriptions which provide adequate opportunities for non-motorized or quiet recreation experiences and are written to enhance the other values that ultimately contribute to the experiences of the area.

VIII. TRAVEL MANAGEMENT

A. Criteria Specific to the National Conservation Lands

As discussed previously in these comments, National Monuments are held to a higher standard of protection as units of the National Conservation Lands. The San Juan Islands National Monument Proclamation identifies a wide range of resources and values to be protected as Monument objects, including cultural, archaeological, paleontological, geologic, ecological, historical, educational, and scientific resources. These values can be adversely affected by motorized and mechanized travel, and so BLM should limit these uses within the Monument to protect the aforementioned resources and provide opportunities for quiet, backcountry recreation experiences.

The National Landscape Conservation System 15-Year Strategy has a goal, Goal 1F, for managing facilities within Conservation System units that conserves, protects, and restores the values for which those lands were designated. Action item 2 under Goal 1F of the Strategy states that “[t]he BLM will only develop facilities, including roads, on [National Conservation Lands] where they are required for public health and safety, are necessary for the exercise of valid existing rights, minimize impacts to fragile resources, or further the purposes for which an area was designated.” This is a clear recognition that roads should be limited to the minimum network necessary for the management of the monument.

Additionally, the Monument Proclamation includes specific travel management guidelines for the Monument. Motorized travel in the Monument is to be limited to designated roads and mechanized use is to be limited to designated roads and trails. The Carrizo Plain National Monument RMP limits motorized vehicles in the monument to street-licensed vehicles only (PRMP 2-114). This helps prevent illegal off-road use in the monument, and we recommend BLM adopt a similar approach in the San Juan Islands National Monument.

Recommendations: BLM has policy direction for units of the National Landscape Conservation System that requires designation of roads only when required for public health and safety, are necessary for the exercise of valid existing rights, minimize impacts to fragile resources, or further the purposes for which an area was designated. This is, in short, the “minimum road network” necessary for protection of the values for which the unit was designated. BLM should both analyze a minimum road network alternative and choose it as the best option consistent with BLM policy and for the protection of monument objects.

IX. EDUCATION AND INTERPRETATION

Outreach, education and interpretation are important considerations when helping to guide visitor experiences as well as to protect the resource itself from damage on-the-

ground. Recent BLM policies for Monuments provide guidance on outreach, education and interpretation to visitors. BLM should consider including management prescriptions for education and interpretation within the Monument plan based on these policies.

The 15-Year Strategy for the National Conservation Lands states that BLM will engage the public in stewardship of the National Conservation Lands through education and interpretation (15-Year Strategy at Goal 3D). Part of this includes developing “education and interpretation plans for priority areas within the [National Conservation Lands].” (*Id.* at Goal 3D(4)). In addition, BLM Manual 6220 states that BLM District and Field Managers must “provide appropriate recreational opportunities, visitor services, and educational and interpretive programs to enhance the public’s understanding and enjoyment of Monuments and NCAs,” consistent with the Proclamation. (BLM Manual 6220, at 1.4(C)(5)).

Recommendations: The management plan should include a review of opportunities for the interpretation of the natural and cultural features of the Monument. The management plan should require that within 3 years, BLM will complete an interpretation plan for the monument. In addition to general topics on the cultural and natural resources of the Monument, topics more specific to the Monument might include:

X. CLIMATE CHANGE

A. Consideration of climate change in the RMP/EIS

BLM has a legal duty to address the impacts of climate change both from land management actions and to the resource area in the RMP. There is a global scientific consensus that human-induced climate change is currently altering the landscape and ecological functions at an unprecedented rate. According to the U.S. Climate Change Science Program, the Southwest landscape could be greatly transformed due to drought, wildfire, invasive species, and rising temperatures.

The planning area will undoubtedly experience real effects of climate change during the 20 year period that the RMP is in effect. Prescriptions in the RMP may contribute to and exacerbate the impacts of human-induced global climate change. In addition to a genuine analysis of impacts, it is imperative that BLM craft strategies for addressing the impacts of climate change both in terms of mitigating management decisions’ contributions to climate change and adapting to inevitable impacts of climate change.

Secretarial Order (S.O.) 3289 unequivocally mandates all agencies within the Department of Interior to “analyze potential climate change impacts when undertaking long-range planning exercises, setting priorities for scientific research and investigations, developing multi-year management plans, and making major decisions regarding potential use of resources under the Department’s purview.” (S.O. 3289, incorporating S.O. 3226). This planning process falls squarely under this guidance and BLM must assess impacts from

the proposed actions that may directly, indirectly, or cumulatively result in exacerbating climate change within this document.

BLM baseline data on climate change must be sufficient to permit analysis of impacts under NEPA. Importantly, 40 C.F.R. § 1502.15 requires agencies to “describe the environment of the areas to be affected or created by the alternatives under consideration.” Establishment of baseline conditions is a requirement of NEPA. In *Half Moon Bay Fisherman’s Marketing Ass’n v. Carlucci*, 857 F.2d 505, 510 (9th Cir. 1988), the Ninth Circuit states that “without establishing . . . baseline conditions . . . there is simply no way to determine what effect [an action] will have on the environment, and consequently, no way to comply with NEPA.” The court further held that “[t]he concept of a baseline against which to compare predictions of the effects of the proposed action and reasonable alternatives is critical to the NEPA process.”

There is a growing body of scientific information already available on climate change baseline conditions, much of it generated by or available through federal agencies. One such resource would be the North Pacific Landscape Conservation Cooperative (LCC). This LCC could and should be engaged in compiling available data and resources for the landscape to help inform land use planning processes in this region. Another resource that BLM should tap is the DOI Northwest Climate Science Center.

BLM’s duty to evaluating reasonably foreseeable significant adverse impacts includes “impacts which have catastrophic consequences, even if their probability of occurrence is low, provided that the analysis of the impacts is supported by credible scientific evidence, is not based on pure conjecture, and is within the rule of reason.” 40 C.F.R. § 1502.22(b). Such impacts are especially significant in the face of climate change.

The impacts of climate change should be a major factor in every alternative that is created since it is an undeniable reality that will drive all land use planning decisions. As provided in the Oregon/Washington BLM State Office guidance document IM OR-2010-012, “[r]esource management plans and other broad programmatic analyses are actions that would typically have a long enough duration that climate change could potentially alter the choice among alternatives.” Thus, it is clear that BLM must consider planning for climate change within the context of the broader landscape during the development of the RMP for the planning area.

With particular regard to the Monument, Secretarial Order 3308 regarding the management of the National Landscape Conservation System states that these lands “shall be managed as an integral part of the larger landscape, in collaboration with the neighboring land owners and surrounding communities, to maintain biodiversity, and promote ecological connectivity and resilience in the face of climate change.” (*See*, <http://www.doi.gov/csc/southwest/index.cfm>).

BLM must also include a range of alternatives that includes a strategy for mitigating the impacts of climate change. CEQ regulations instruct agencies to consider alternatives to

their proposed action that will have less of an environmental impact, specifically stating that “[f]ederal agencies shall to the fullest extent possible: . . . Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment.” 40 C.F.R. § 1500.2(e) (emphasis added); see also, 40 C.F.R. §§ 1502.14, 1502.16.

Further, general statements that BLM will conduct monitoring are also not an appropriate form of mitigation. Simply monitoring for expected damage does not actually reduce or alleviate any impacts. Instead, a vigilant science-based monitoring system should be set out in the RMP in order to address unforeseeable shifts to the ecosystem. A detailed monitoring approach is also required under the BLM’s planning regulations:

The proposed plan shall establish intervals and standards, as appropriate, for monitoring and evaluation of the plan. Such intervals and standards shall be based on the sensitivity of the resource to the decisions involved and shall provide for evaluation to determine whether mitigation measures are satisfactory, whether there has been significant change in the related plans of other Federal agencies, State or local governments, or Indian tribes, or whether there is new data of significance to the plan. The Field Manager shall be responsible for monitoring and evaluating the plan in accordance with the established intervals and standards and at other times as appropriate to determine whether there is sufficient cause to warrant amendment or revision of the plan. 43 C.F.R. § 1610.4-9.

Such vigilant monitoring is absolutely necessary in order to create an effective adaptive management framework in the face of climate change.

The following is our recommended approach to developing management prescriptions to allow the land and resources to adapt to the impacts of climate change while meeting the agency’s legal obligations:

Recommendations: Under the pressures of global change, it must be acknowledged that many objects of conservation are at risk wherever they are found, and the traditional natural resource management paradigm of modifying ecosystems to increase yield must change to a new paradigm of managing wildland ecosystems to minimize loss – specifically loss of the ecosystem composition, structure, and function that yields the benefits we seek from wildlands. Natural resource management must change from a paradigm of maximum sustained yield to a paradigm of risk management.

Although there is no widely-accepted method of assessing and managing risk, we recommend breaking risk down into its component parts—vulnerability, exposure, and uncertainty—as a useful way to think about risk to biodiversity and productive potential. In the attached recommended approach to addressing climate change in land use planning (Appendix 1), we recommend an approach for assessing risk in the planning area as well

as an approach for management of that risk for BLM to comply with its legal obligations under laws and regulations.

B. Climate change adaptation

In addition to the analyzing the impacts of climate change, The Department of Interior Manual for climate change adaptation (523 DM 1) requires BLM to plan for uncertainty and risk in the face of climate change. Among other things, this policy guidance requires BLM to:

- use the best available science of climate change risks, impacts and vulnerabilities,
- use the network of Landscape Conservation Cooperatives, Climate Science Centers and other partnerships to understand and respond to climate change,
- use well-defined and established approaches for managing through uncertainty including vulnerability assessments, scenario planning and other risk management approaches,
- promote landscape-scale, ecosystem-based management approaches to enhance the resilience and sustainability of linked human and natural systems,
- Manage linked human and natural systems that help mitigate climate change impacts, such as:
 - protect diversity of habitat, communities and species,
 - protect and restore core, unfragmented habitat areas and key habitat linkages,
 - maintain key ecosystem services,
 - monitor, prevent and slow the spread of invasive species,
 - focus development activities in ecologically disturbed areas and avoid ecologically sensitive landscapes, culturally sensitive areas, and crucial wildlife corridors.

The biggest question that land managers face today is how we respond to uncertainty in the face of global climate change. It is especially challenging for planners to make predictions about future ecosystem dynamics 10, 20 or 50 years down the line. Adaptation to changing conditions is and will be essential. However, general statements that BLM will plan to “be adaptive” is not planning—it is a strategy that is reactive only. A true plan for climate adaptation will require applying knowledge and foresight gained from a “learn as you go” approach.

We recommend using an experimental, adaptive design known as the “portfolio approach” of management strategies (Belote et al.)³ in the RMP. As stated by Belote et al., “[u]ncertainty about how ecosystems and species will respond to co-occurring, interactive, and synergistic impacts of the Anthropocene precludes our ability to know

³ These concepts are set out in Belote, et al. “Wilderness and Conservation Strategy in the Anthropocene.” The Pinchot Letter (Spring 2014).

which strategy will best sustain wildland values in to the future.” Thus, Belote et al. concludes that land managers should use an experimental zoning approach for managing certain lands that include the following zones as management strategies:

- **Restoration Zones:** areas that are devoted to forestalling change through the process of ecological restoration;
- **Innovation Zones:** areas that are devoted to innovative management that anticipates climate change and guides ecological change to prepare for it; and
- **Observation Zones:** areas that are left to change on their own time to serve as scientific “controls” and to hedge against the unintended consequences of active management elsewhere.

These strategies should be used in conjunction with each other in order to spread the risk among the different strategies and to allow for diverse outcomes to inform rapid learning about management strategies in the future. This is the kind of deliberate yet dynamic planning process that BLM should be fostering in RMPs.

The BLM is especially equipped to apply this type of portfolio approach due to its wide variety of designations and management regimes. The purpose of **restoration zones** is to sustain existing or historical ecosystems. This type of strategy lends itself to designations such as national conservation areas, ACECs and other lands that are set aside for conservation of natural and cultural resources, but that may also be appropriate for restoration in certain areas.

Due to the acknowledgement that returning to historical range of variability is an increasingly challenging concept in the study of climate change, **innovation zones** are also necessary. This is where the forecasting of climate change may drive greater intervention to experiment with things like anticipatorily boosting resiliency or facilitating transition to an altered future state where shifts seem inevitable. This strategy would be more appropriate for BLM-managed lands that have already sustained substantial change or where future impacts of climate change may severely disrupt the production of ecosystem goods and services. Conservation designations or allocations would typically not fall within this management strategy.

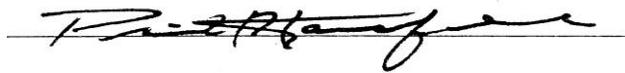
The third strategy of establishing **observation zones** is necessary to allow for ecosystems to generally change without specific intervention, as a scientific control. This management strategy would be most appropriate for Wilderness, WSAs, and lands managed for wilderness characteristics, but would also be the default strategy for lands that could not be managed for treatment under the restoration and innovation zones due to budget and operational constraints or in lands between such designations where connectivity is desirable to facilitate movement in response to climate change.

Recommendation: BLM should implement a portfolio approach to land use planning that allows for diverse strategies and adaptive, dynamic planning as a climate change adaptation strategy. This involves establishing restoration, innovation and observation zones in order to “learn while doing.”

CONCLUSION

We appreciate BLM’s consideration of these scoping comments on the San Juan Islands National Monument RMP. As described in the Proclamation, the Monument is an incredibly important part of our public land heritage and we look forward to working with the BLM to find cooperative management solutions going forward. Please do not hesitate to contact us with any questions you may have or information about the Monument or planning process.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Hanceford", is written over a horizontal line.

Phil Hanceford, Assistant Director
The Wilderness Society, BLM Action Center
1660 Wyknoop Street, Suite 850
Denver, CO 80202
303-650-5818, ext. 122



April 1, 2015

Delivered via email
blm_or_sanjuanislandsnm@blm.gov

San Juan Islands National Monument RMP
P.O. Box 3
Lopez, WA 98261

Re: Scoping Comments for San Juan Islands National Monument Planning Process

To Whom It May Concern:

Please accept the following comments from Friends of the San Juans (“Friends”) regarding San Juan Islands National Monument Resource Management Plan (“Monument Plan”). Friends is a 501(c)(3) non-profit organization whose mission for over 35 years has been to protect the land, sea, water & livability of the San Juan Islands and the Salish Sea through education, citizen involvement, science, and law. Friends is based in Friday Harbor on San Juan Island and represents 2000 members who recreate, reside or visit this area.

In 2013 President Obama signed a proclamation creating the San Juan Islands National Monument. This covers recreational areas, cultural sites, historic sites, and endangered habitats.¹ The Monument is centrally located in the Salish Sea which includes the Strait of Juan de Fuca, the Strait of Georgia, Puget Sound, and the waters around and between the San Juan Islands in the U.S. state of Washington and the Gulf Islands in British Columbia, Canada.

The Monument is a rich but vulnerable area home to over 20 Coast Salish Tribes in Washington State and British Columbia, Canada. Biologically 37 mammals, 172 birds, 300 fish, and 3000 macro invertebrates are found in the Monument. 113 of these species have been listed as either threatened, endangered, of concern or candidate of listing on the US Endangered Species Act or Canada’s Species at Risk Act. In addition to these potentially impacted species, other vulnerabilities to these areas include:

1. Endangered Species, with overlapping national, regional and international conservation obligations for, inter alia, bird life,² marine mammals (and the Southern Resident Killer Whale in particular),³ fish, and specifically Chinook salmon.⁴

¹ www.sanjuanislandsnca.org

² Domico, T (2007). *Natural Areas of the San Juan Islands*. (Turtleback, Washington). 59-64, 81, 158. Johnson, C & J (2011). *Birds and Habitats of the Puget Sound Area* (Orange Spot, Seattle). Downing, J. (1983). *The Coast of Puget Sound*, (University

2. San Juan County Marine Stewardship Area Plan (MRC, 2007)⁵.
3. San Juan County Voluntary no-fishing zones for rockfish.⁶
4. San Juan County economy - heavily based around the natural values of the area.⁷
5. Cultural and Economic staple for over 20 US and Canadian Coast Salish tribes.

ISSUES

Below is a summary of the issue that FRIENDS would like to see addressed in the San Juan Islands National Monument Planning Process:

1. Relationship with other Management Plans.
2. Consolidation of management and enforcement.
3. Education / Interpretation - Unified messages to improve visitor experience.
4. Cultural Interpretation of First Nations presence.
5. Oil Spill Preparedness:
 - a. Consequences of using dispersants as a means of combating oil spills on wildlife.
 - b. Risk Assessment: oil spill from Neighboring 4 Refineries and vessel traffic.
6. Economic Impact of Visitors
7. Noise Impacts

of Washington Press, Seattle). Washington Department of Fish and Wildlife Program (2009). *Status and Trends of Marine Birds in Washington's Southern Puget Sound*. (WDFW, Seattle). 7-8. Washington Department of Fish and Wildlife (2006). *Nearshore Birds in Puget Sound* (Washington Department of Fish and Wildlife Technical Report 2006-05, Seattle). A number of species which frequent Puget Sound, which forms part of the Pacific Flyway, are listed as protected under the Migratory Bird Treaty Act. Note also the *North American Waterfowl Management Plan between Canada and the United States*.

³ National Marine Fisheries Service (2011). *Southern Resident Killer Whales: Five Year Review* (NMFS, Seattle); NOAA (2008). *Recovery Plan for Southern Resident Killer Whales*. (NOAA, Washington). 2, 56-58; Department of Commerce, NOAA, *Endangered Status for Southern Resident Killer Whales*. 50 CFR Part 224. Final Rule. As printed in the Federal Register /Vol. 70, No. 222 / Friday, November 18, 2005 /Rules and Regulations 69907.

⁴ National Marine Fisheries Services (2012). *The Effects of Salmon Fisheries on Southern Resident Killer Whales: Final Report of the Independent Science Panel*. (NOAA, Seattle). 3-4. National Marine Fisheries Service (2011). *Southern Resident Killer Whales: Five Year Review* (NMFS, Seattle). 6; NOAA, *Endangered and Threatened Species; 5-Year Reviews for 17 Evolutionarily Significant Units and Distinct Population Segments of Pacific Salmon and Steelhead*. 50448 Federal Register / Vol. 76, No. 157 / Monday, August 15, 2011 / Proposed Rules. Note the Fish and Wildlife Coordination Act, the Magnus-Stevens Fishery Conservation and Management Act-Essential Fish Habitat, and international conservation efforts under the 1985 Pacific Salmon Treaty.

⁵ San Juan County Marine Stewardship Area Plan. (San Juan County Marine Resources Committee, 2007).

<http://www.sjcmrc.org/uploads/pdf/MSA%20plan%202002-Jul-2007%20Final.pdf>

⁶ <http://www.sjcmrc.org/Projects/MRC-Projects/Current-Projects/Rockfish.aspx>

⁷ For the popularity see, for example, the New York Times, The 41 Places to Go in 2011; National Geographic Traveler, The Best Trips for Summer 2011; Lonely Planet: US Islands That Won't Break the Bank. Dolesh, R. (2011). 'Assessing the Value of Feathered Workers: Birds Perform a Multitude of Services that Contribute to Our Well-Being'. *Birder's World* 25(4): 12-20; For the figures, see Dean Runyan Associates (2009). *The Economic Impacts to Visitors of Washington State Parks*. ; IUCN (2003) 'Protected Areas as Engines for Development.' *Parks* 13 (3), 1-71.

8. Impacts of climate change and sea level rise
9. Wildlife Surveys
10. Formalize wilderness management status for the remote rocks/islands
11. Consider potential impacts to Monument resources and goals from land use practices on surrounding properties.

ISSUE 1

Relationship with other Management Plans.

There are three significant planning documents that the San Juan Islands National Monument Planning team should review as background for this process to ensure consolidation of effort, ideas and avoid public survey fatigue:

- a. The San Juan Islands Scenic Byways Committee completed a Corridor Management Plan (CMP) for the San Juan Islands Scenic Byway.⁸ (Otak, 2011).
- b. The San Juan County Parks, Trail, and Natural Areas Plan 2011-2016 (Trust for Public Lands, 2010).⁹
- c. San Juan County Marine Stewardship Area Plan (MRC, 2007)¹⁰.

The San Juan County Parks, Trails, and Natural Areas Plan provides a long-term vision and six-year plan to guide action and investment in a wide variety of outdoor spaces and facilities managed by San Juan County. Over the course of one year, San Juan County worked with The Trust for Public Land to assess community needs, engage the public, and craft a plan that strengthens the parks system and charts a clear future for San Juan County Parks, Land Bank, and Public Works, which are the three County departments charged with overseeing County parks, trails, and natural areas facilities. This Plan updated the 2005-2010 Plan for Parks, Recreation, and Preserved Lands for San Juan County and is designed to maintain San Juan County's eligibility for state-based park and recreation grant funding. While this Plan builds on the 2005 Plan, some significant updates and enhancements include 1) Comprehensive Assessment of Community Needs, 2) Park, Trail, and Natural Area Inventory and Classification System, 3) Collaborative Mission and Long-term Community Vision, 4) Detailed Six-year Action Plan that identifies key partners, timelines, and geographic areas for implementation of actions and projects that align with the Plan's goals and strategies.

The Corridor Management Plan (CMP) for the San Juan Islands Scenic Byway included citizens from communities on San Juan Island and Orcas Island, along with agency partners at

⁸ The San Juan Corridor Management Plan for the San Juan Islands Scenic Byway (Otak, 2011). www.visitsanjuans.com Corridor Management Plan for the San Juan Islands Scenic Byway.

⁹ San Juan Parks Trails Natural Areas Plan (Trust for Public Lands, 2010) www.co.san-juan.wa.us/parks/docs/FINAL_San_Juan_Parks_Trails_Natural_Areas01_2011.pdf

¹⁰ San Juan County Marine Stewardship Area Plan. (San Juan County Marine Resources Committee, 2007). <http://www.sjcmrc.org/uploads/pdf/MSA%20plan%202002-Jul-2007%20Final.pdf>

the local, regional, state, and federal level, joined together to develop the corridor management plan, which charts a course for the future of the San Juan Islands Scenic Byway. The CMP included recommendations for expanding stewardship and enhancing visitors' experiences along the byway, while at the same time preserving the sensitive scenic, natural, archaeological, historic, cultural, and recreational resources of the islands and the quality of life enjoyed by islanders. CMP recommendations also included expanding multi-modal transportation options to reduce environmental impacts, enhance community livability, and improve visitor access.

San Juan County Marine Stewardship Area Plan. Through the Nature Conservancy planning process and with the help of many partner organizations, stakeholders, managers, and local citizens, the San Juan County Marine Resources Committee identified over 35 priority strategies under the Marine Stewardship Area plan. These strategies were presented to citizens throughout the county and other key stakeholder groups through a series of presentations and public meetings on all the ferry serviced islands.

ISSUE 2:

Consolidation of management and enforcement (Bureau of Land Management, US Fish and Wildlife Service, State Parks, County Parks, Washington Department of Fish and Wildlife, San Juan County Parks).

There are multiple jurisdictions with overlapping jurisdiction that have different levels of regulations and enforcement.

Recommend: an analysis of regulations and recommendations for harmonization of rules, regulations, and enforcement among all property managers in the Monument. We would recommend that an evaluation of cost saving measure for enforcement staff and vessels (i.e. boats used by State Parks for servicing outer-island camping sites for garbage, fee collection, etc and boats used by USFWS for research or enforcement could be consolidation through inter-local memorandums of understanding and other types of cost sharing measures).

ISSUE 3

Education / Interpretation - Unified messages to improve visitor experience.

This plan should include a comprehensive synthesis of existing reports for education and interpretation in the Monument such as the Open Space and Parks Plan and the San Juan Islands Scenic Byway Corridor Master Plan.

Recommend the formation of Marketing, Education Technical committee which would include elements identified in the San Juan Islands Scenic Byway Corridor Master Plan to complete the following:

- Build a cohesive "brand identity" for the Monument; creating a distinctive character of signing, logos, gateways, etc.

- Develop Monument specific promotional materials (apps, boating, driving tours, brochures, videos, etc.)
- Increase business, tax revenue, and jobs by enhancing tourism in areas throughout the Monument that can adequately support increased visitation.
- Leverage funding and resources through collaborative planning and partnerships.
- Print maps of visitor destinations along the Monument;
- Develop a Monument poster, “Leave no Footprints” to enhance stewardship.
- Develop a Monument poster and/or interpretive panel to enhance the awareness of the Salish Sea and Native American/First Nation place names of major points of interest (defined by tribes).

ISSUE 4

Cultural Interpretation of First Nations presence and use of the land, water, sea.

The presence of archeological sites, historic lighthouses, and a few tight-knit communities testifies that humans have navigated this rugged landscape for thousands of years. These lands are a refuge of scientific and historic treasures and a classroom for generations of Americans.

The islands are part of the traditional territories of the Coast Salish people. Native people first used the area near the end of the last glacial period, about 12,000 years ago. However, this history is not well interpreted. The importance of edible plants, hunting various birds and mammals, use of fire to maintain meadows of the nutritionally rich great camas are all well documented. Archaeological remains of the villages, camps, and processing sites are located throughout these lands, including shell middens, reef net locations, and burial sites exist throughout the Monument.

Wood-working tools, such as antler wedges, along with bone barbs used for fishing hooks and projectile points, are also found on the islands. Scientists working in the San Juan Islands have uncovered a unique array of fossils and other evidence of long-vanished species. Ancient bison skeletons (10,000-12,000 years old) have been found in several areas, indicating that these islands were an historic mammal dispersal corridor. Butcher marks on some of these bones suggest that the earliest human inhabitants hunted these large animals.

Recommend the establishment of Coast Salish inter-tribal cultural restoration committee to guide interpretive content and materials proposed for the monument.

ISSUE 5

OIL SPILL

Use of Dispersants - Dispersants used in the Gulf of Mexico BP oil spill have been found to be more toxic to the biota of the gulf than the massive amount of crude oil that was spilled. Long term studies on efficacy and safety need to be conducted and continued before the use of dispersants can be determined to be appropriately useful in oil spill circumstances, particularly in our high current turbulent tidal waters, and complex shorelines.

Recommend that the Monument consult with the Coast Guard, NOAA, USFWS, Tribes, Department of Ecology and San Juan County Emergency Management Services, and IOSA to formulate a scientifically responsible position on how the BLM will address dispersant use within its jurisdiction and what effects such dispersant use would have on the Monument in the course of developing the Resource Management Plan for the San Juan Islands National Monument. Conduct a risk Assessment of oil spill from Neighboring 4 Refineries and vessel traffic around the Monument.

ISSUE 6

Economic Impact of Visitors on the Monument

The San Juan Islands National Monument derives a significant portion of its commerce through tourism and promotes itself as a place to enjoy nature. Recommendation: Evaluate the economic impacts of the natural areas of the monument.

ISSUE 7

Noise

The impacts of underwater noise from existing and proposed vessel traffic and overflight naval test flights may pose significant impacts to marine birds and mammals that reside in, or frequent the waters, of the Monument. Recent and expanded air traffic from Whidbey Air Force Base has been an issue that the public has expressed concern over as an impact to both human and wildlife. There is a variety of underwater noise studies from the San Juans. We recommend that the Monument study the impacts of underwater noise as they risk assessment for the Monument and also consider an analysis of impacts from overflight noise resulting from Navy Growler overflights.

ISSUE 8

Climate Change

The consequences of climate change as it would affect the San Juan Islands National Monument is a topic with impacts to access to resource lands, cultural sites, and visitor parking. Please study the probabilities of increased diseases which might affect forests, meadow lands, and wetlands, including what might be expected as to food abundance and population sustainability for all species of animals inhabiting Monument lands and waters. Additionally, evaluate the potential for increased wildfires engendered by predicted temperature increases, changes in weather and rainfall patterns within the Monument's jurisdiction.

Please develop comprehensive evaluations of the range of effects that climate change might impose on Monument lands and waters in the development of the Resource Management Plan for the San Juan Islands National Monument.

ISSUE 9

Wildlife Surveys

The diversity of habitats in the San Juan Islands is critical to supporting an equally varied collection of wildlife. Marine mammals, including orcas, seals, and porpoises, attract a regular stream of wildlife watchers. Native, terrestrial mammals include black-tail deer, river otter, mink, several bats, and the Shaw Island vole. Raptors, such as bald eagles and peregrine falcons, are commonly observed in the islands. Varied seabirds and terrestrial birds can also be found here, including the threatened marbled murrelet and the recently reintroduced western bluebird. The island marble butterfly, once thought to be extinct, is currently limited to a small population in the San Juan Islands.

A comprehensive analysis of all biological research for the monument should be assembled with participation from NOAA, USFWS, BLM, Friday Harbor Labs, Friends of the San Juans, Kwihat, Audubon, Seadoc, San Juan Preservation Trust, San Juan Conservation district, Long Live the Kings, and other local and regional groups and biologist.

While this synthesis is being conducted, two primary assessments should be conducted to complement existing studies and needs. These studies include:

- 1) Complete Puget Sound Seabird Study for the Monument following the protocols developed by the Seattle Audubon and completed throughout Puget Sound.
- 2) Complete a comprehensive amphibian study for the Monument.

ISSUE 10

Formalize wilderness management status for the remote rocks/islands

Currently, the many isolated rocks and tiny islands owned by the BLM are managed as ‘defacto’ wildlife refuges, due to their intermixing and proximity with the federal wildlife refuge system and their past management. These sites are critical human free areas for marine mammals and seabirds and deserve to remain as wilderness. In addition, public understanding and acceptance of these sites as refuges is also strong; changes to this no-landing status for BLM lands would endanger all sites within the system and create a serious management challenge at these numerous and highly remote locations.

ISSUE 11

Consider potential impacts to Monument resources and goals from land use practices on surrounding properties.

Most monument properties are relatively small and exist in a landscape context that includes extensive private and some other public ownerships that do not align well with natural geologic or ecological processes. Awareness of the potential impacts from surrounding land use, and work to coordinate management objectives at the landscape scale are needed.

FRIENDS of the San Juans appreciate your consideration of our comments on the San Juan Islands National Monument Resource Management Plan.

Sincerely,

Stephanie Buffum, MPA/MURP
Executive Director

Public-at-Large

Hi Marcia and Nick,

My two cents on the RMP re: invasive species: Outdated word and approach.

I've been a student of permaculture for several years, and using permaculture land restoration techniques would assess invasives as indicators for forest (or prairie) succession stage and soil health primarily. The difference between current invasives species management predominantly in public lands (and private) and what I believe SHOULD be in invasives management could be likened to western medicine and a holistic health care approach. Some noxious weeds are just that – incredibly opportunistic and wipe out a segment of the native population that might be more susceptible to altered conditions. But not all are, and it's worth sorting out a proper approach for each plant using that plants' native characteristics weighed against the healthiest, end-result of the local ecosystem we can imagine.

For example – 'pioneer species' like thistle or scotchbroom come in after clearing land of topsoil and plant life. Thistle's deep tap root and broad lateral root system help to mine minerals from deeper in the soil to bring to the surface and re-establish rich and appropriate topsoil to the ecosystem. Those specific minerals may invite the next round of pioneer species, or perhaps we call them, 'integrating species'. Thistle grows rapidly, is thorny to keep humans/livestock away from the plant, say as in the case of overgrazing, and accumulates deep soil minerals through its leaves onto the soil surface, IF allowed to grow and then rot in place. It's a wonderful mulch to 'chop and drop' in situ, to provide compost for the soil. Management techniques might be – chopping and dropping at the base to avoid spread by seedhead, but allowing the plant to add compost to the soil which will build organic matter more quickly and encourage plant succession more quickly. Roots are allowed to propagate the plant which might encourage heavy growth in a small area and speed up the succession even more rapidly, especially if compost matter builds quickly and roots allow for soil aeration and water filtration.

Scotchbroom, a nitrogen fixer, does just that – it shows up when vegetation and the topsoil's own ability to replenish its nitrogen source is no longer a component due to whatever circumstance. It has a deep taproot, like thistles, which also help to 'break up' soil – due to heavier clays, compaction and so on. Water runs along plant stalks and into the the soil via the tap root, allowing the water table to be replenish in drought areas, and tap roots encourage oxygen replenishment to lower soil levels to aid micro-organism re-establishment. We have many nitrogen fixing alternatives that might be considered 'more native', and they or may not mimic the deep tap root....but maybe a dibbler 'aerates' the soil similar to lawn aeration on a golf course? If so, then scotch broom removal satisfies scotch broom removal advocates, nitrogen is still fixed with a more appropriate local plant that does not upset ecological flora/fauna that adapted to conditions without scotch broom, and kids still have something 'important to do' by jumping on a dibbler like a pogo stick to aerate the soil AND it actually takes place quickly. Perhaps kids can even cut up scotchbroom into smaller segments to aid in its quicker breakdown. The faster we replenish the soil, the more quickly favorable soil conditions shift which plants will appear. This is a continuous observation and adjustment process that takes into account historical, current and desired end result conditions all at once for its self-evaluation process.

By removing pioneer plants, we SET BACK the lands' ability to heal itself, especially if we do not replant with a plant that would provide a similar ecological experience than the removed plant. By knowing and understanding plant properties, what they indicate about the site, soil health, water availability and natural selection, we can replace them w/ similar plants or allow them to continue to do their work. We can play with the spectrum of time in regards to forest succession to speed up the desired end result, which most public lands have in mind, i.e. coastal prairies.

So, take for example, the problem plant that is thistle – mapping its location first, shows us a distribution and how it may change year to year. Adjacent soil sampling in mapped areas can indicate

minerals and components present and absent, and perhaps also available water levels. Knowing fire ecology history, forest succession times for certain species (i.e. invasive blackberries last 15-20 years in one area), and native or more appropriate substitutes, we can gauge a more proper alteration of the ecology than JUST removal. The removal itself without the other components may be detrimental to the local ecology's ability to heal itself, especially if we do not replace removed pioneer species with soil amendments, or add chemical elements to the soil (pesticides, herbicides) to eliminate certain plants.

As a director of a youth corps, it's INCREDIBLY BORING to remove invasive species year after year and know you're probably doing the wrong thing. I'd liken it to removing the pressure bandage over an arterial wound and replacing it with a bandaid, believing the bandaid will do a better job. It's also not easy to always explain why certain plants are removed without the kids resorting to the 'good plants/bad plants' game, which is entirely inaccurate. It's like plant racism:).

I have no idea where BLM is in its process, but I know what hasn't been explained to me in most cases of invasive species removal, and that is any kind of permaculture consideration or approach. If it were me, instead of removing thistle seed heads first, I'd map plant distribution, take soil samples and water samples, and consider big picture topography when looking at 1 species plant distribution. I'd examine whatever known historical plant distribution is playing into present and historical use of land and all related factors – grazing, fire, farming, historical elk that would've added poop to replenish the soil that are now missing, and so on. Did the farmers are American Camp plow the soil? If so, they might have disturbed the thin, precious skin that led to Dust Bowl conditions. Are we still recovering from that? I'd find out what soil elements are missing via soil tests, and I'd check to see if the 'invasive species' present in those areas where certain minerals may be missing, are the plants to provide those elements. I'd analyze specific plant properties against the big picture – will 'thistle compost' help build the soil in this historically, over-grazed, drought-laden area? Will it just provide fuel for fire? Can we 'drop and chop' thistle to build compost for 3 years without it creating a serious prairie fire hazard? What is best management that takes into consideration that the plants in situ might be actually be helping the local ecology heal (in its own time frame using the elements it has present to it) because we allow nature to know best what it needs without human interference? What substitutions can we make in place of missing elements that enhance management rather than detract from it? Who might be motivated to perpetuate an 'invasive species' management approach? Could pesticide companies have a motivation? Indeed Dow chemical representatives sit on the national invasive species board. If we observe what nature is providing to heal herself, can we mimic those processes to speed up the time frame to reach our end goal? What would that look like and what plants would provide similar nutrients/elements, soil amendments or 'waste material' in the form of compost that could be added to build an ecology that supports our ultimate goal? Can we add them all at once to bring about the fastest version of an end ecological result? This is the ideology behind a food forest – it's very worthwhile to look into the components and how they support one another. It's using old-growth forests as the ultimate in balanced, end result forest succession that includes integrative plant support through canopy species, mid-canopy plants, shrubs, ground covers and vines.

I understand managing a prairie without migrating herds, native peoples, glaciers and wildfire is nearly impossible, but I'd rather not perpetuate the removal of the small efforts the prairie is making to heal itself through removal of so called 'invasive species'. One great aspect about permaculture is its ability to turn problem into solution by shifting common perception, or in this case mis-perception, to a positive by mimicing natural systems rather than imposing human will on them. Invasive species are just that example – IF you trust that nature is providing for herself exactly what she needs. Perhaps we suggest a multi-vitamin to her that acts faster than the singular vitamin she was choosing?

San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

FIVE

MAR 17 2015

BY: SJI PM

The Bureau of Land Management (BLM) Spokane District is seeking early public input, through a process known as scoping, as it begins preparing a Resource Management Plan (RMP) for the San Juan Islands National Monument. The RMP will provide the goals, objectives, and direction that will guide the BLM's management of the National Monument for the next 15 to 20 years. The BLM defines scoping as a collaborative public involvement process to identify planning issues to be addressed through the plan. For your comment to be reflected in the scoping report, and to be the most helpful for identifying issues to be addressed during the planning effort, please ensure that your scoping comments are submitted or postmarked by **April 1, 2015**.

The BLM wants to hear from you! The following questions have been provided to help you provide the most useful comments to the BLM but all comments are welcome. Please feel free to attach additional sheets of paper if your comments do not fit below.

1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

Fragile ecosystems on some of the properties.
Hard-to-get-to, and therefore less monitoring of resources.

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

Making much of what we know (and find out) about the resources available online: natural (geological, flora & fauna, ecosystems etc) and cultural (the Coast Salish, Euroamerican homesteads and settlement, recreational development).

A graded system of public access - some areas protected with out-of-bounds, others more accessible, etc.

Establish a good baseline & then monitor impact & changes.

3. What are other topics or concerns that you would like the BLM to address through the planning process?

(Sorry, you've heard it before)

- Monument lands as "outcrops" or "leftovers" from public land alienation process (i.e. homestead)
- fragile "vernacular" landscapes: homesteads, fields, fencing, cabins, reef net stacks, etc. (often neglected)
- the process of how the SJI NM evolved (how did it become a monument)



4. Other thoughts or suggestions?

I really like the idea of a "virtual" monument to provide "visitation" without leaving a physical impact. This could serve as both an educational and recreational resource.

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Name: _____

Mailing Address: _____

Email Address: _____

Please indicate your affiliation by checking **one** of the following boxes:

- Individual (no affiliation)
 Private Organization
 Citizen's Group
 Elected Representative
 Tribal, Federal, State, or Local Government

Name of organization, government, group, or agency (if applicable) _____

Comments may be submitted via the following methods:

Email: blm_or_sanjuanislandsnm@blm.gov

Mail: San Juan Islands National Monument RMP, P.O. Box 3, Lopez, WA 98261

Hand delivery: At a public meeting or BLM Lopez Island Office, 37 Washburn Place, Lopez Island, WA 98261

Fax: 503-808-6333



San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

RECEIVED
MAR 11 2015
SJI PM

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Even passive recreation can be detrimental to ecological landscapes. The challenge for BLMs management of the SJINM will be providing public access while protecting the ecological/wildlife habitat values.

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

Consider setting aside portions of SJINM parcels for wildlife habitat only w/ more clearly defined trails & recreation viewing areas.

3. What are other topics or concerns that you would like the BLM to address through the planning process?

Cultural resource interpretation is critical.
Utilize on-line ^{info, programs etc} & off-site venues to enhance public access.



4. Other thoughts or suggestions?

Thank you for hosting this open house!
I really appreciate the inclusive
public process in developing the RMP!

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San Juan Islands National Monument
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Scoping Comment Form

RECEIVED
MAR 12 2015
BY: Ferry PM

The Bureau of Land Management (BLM) Spokane District is seeking early public input, through a process known as scoping, as it begins preparing a Resource Management Plan (RMP) for the San Juan Islands National Monument. The RMP will provide the goals, objectives, and direction that will guide the BLM's management of the National Monument for the next 15 to 20 years. The BLM defines scoping as a collaborative public involvement process to identify planning issues to be addressed through the plan. For your comment to be reflected in the scoping report, and to be the most helpful for identifying issues to be addressed during the planning effort, please ensure that your scoping comments are submitted or postmarked by **April 1, 2015**.

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1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

- Rare and important habitats / species
- Well marked recreational areas and trails
- Invasive species management plan
- Public access and use plan (how access will be created or limited)

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

- Create inventory and active management plan for rare and important habitats such as herbaceous balds and Gray Oak habitat. Partner with other groups/agencies to conduct management practices (fir removal etc.).
- Engage interested parties and volunteers for invasive species removal projects / monitoring.

3. What are other topics or concerns that you would like the BLM to address through the planning process?

- For example, Blind Island, adjacent to Shaw has major invasive species and also some beautiful and important natives such as Camas. Outreach and education efforts to engage Shaw Islanders to help remove and monitor invasives could be a good approach (just as a small example.) ;)



4. Other thoughts or suggestions?

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Name: [Redacted]
Mailing Address: [Redacted]
Email Address: [Redacted]

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Name of organization, government, group, or agency (if applicable) San Juan Islands Conservation District

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SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Comments for the scoping period for the San Juan Islands Monument Planning Process

[REDACTED] Thu, Mar 12, 2015 at 10:24 PM

To: "blm_or_sanjuanislandsnm@blm.gov" <blm_or_sanjuanislandsnm@blm.gov>

Hello,

I would like the scoping process to include discovery of the effects of noise, specifically aircraft noise from over-flights and jet engine run-ups from Naval Air Station Whidbey Island.

I would hope this discovery includes actual sound measurements (not average sound).

The effects should include effects on animals as well as humans who visit the National Monuments. The effects should include the effects on the frequency of human visits to the National Monuments.

If I can think of a better way to express this, I will send another e-mail.

Thank you.

[REDACTED]
Lopez island

RECEIVED
MAR 12 2015

E. Lopez PM

San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

BLM

The Bureau of Land Management (BLM) Spokane District is seeking early public input, through a process known as scoping, as it begins preparing a Resource Management Plan (RMP) for the San Juan Islands National Monument. The RMP will provide the goals, objectives, and direction that will guide the BLM's management of the National Monument for the next 15 to 20 years. The BLM defines scoping as a collaborative public involvement process to identify planning issues to be addressed through the plan. For your comment to be reflected in the scoping report, and to be the most helpful for identifying issues to be addressed during the planning effort, please ensure that your scoping comments are submitted or postmarked by **April 1, 2015**.

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1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

- 1) How to ensure continued access to Iceberg through private lands
- 2) Limit hunting or put up huge signs during hunting season so hunters and hikers are not on the land at the same time. It is a disaster waiting to happen.
- 3) Excessive roses on Iceberg - reduce their extent in a manner

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

- that doesn't result in non-native plants coming in.
- Clearly identify trails and if there are areas where endangered/threatened plants exist, identify those areas so people don't walk all over them.
- Consider having photo album^(online) of wildflowers/plants/animals so visitors know what they are ~~seeing~~ seeing.

3. What are other topics or concerns that you would like the BLM to address through the planning process?

- Document existing conditions adequately - including research on ambient noise levels.
- Have clearly marked landing spots on places like Kelleff Bluff and other places only accessible by water. And designated trails on those fragile places.

Manage these lands for their ecological values. Consider not only visual resource management but also auditory resource management - limit human sounds so the visitor (over)



4. Other thoughts or suggestions?

Can experience the sounds of nature - birds, waves.
Fire is of concern - ^{institute} a no smoking policy on these lands.
Support native plant restoration efforts - encourage
volunteers ~~to~~ in invasive removal and native
plant establishment.

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San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

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MAR 12 2015
pm PM ...

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I Feel that Indian Island should be OFF limits
During parts OF the year when Birds nest there.

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

Have time limits & sealed OFF areas, or
make it OFF limits.

3. What are other topics or concerns that you would like the BLM to address through the planning process?

None



4. Other thoughts or suggestions?

None

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Fax: 503-808-6333



RECEIVED
MAR 12 2015

BY: ...LOPEZ P.M.

May 12, 2015

Re: Scoping for San Juans National Monument

To Whom It May Concern:

I write as a 30 year resident of San Juan County, a volunteer at one of the monument sites, and a former three-term County Commissioner. Since these San Juan National Monument sites are prized by the local community for their beauty, solitude, wildlife, cultural and recreational opportunities, I wish the scoping process to address the following concerns:

- 1) are these sites safe for hunting as it is now conducted, or should modifications be made, due to close proximity to residential housing, and random visitors walking trails in close proximity to potential hunters? What do surrounding park/preserves/conserved areas do in regards to hunting in the San Juan Islands?
- 2) Some National Park Service sites have restricted vehicle access, and even hiking/camping access due to vulnerability of the landscape to large volumes of people traffic. What kind of road improvements and /or parking provisions are envisioned for these sites, in that some are:
 - a. Inaccessible by road
 - b. Accessible only by private roads
 - c. Not resilient enough for large volumes of traffic.
- 3) The National Park Service is now considering soundscapes as part of the environment that it manages. I recommend that BLM also include soundscape in its management plan for this area. What is the nature of the present soundscape? What is the natural wildlife ambient soundscape? Is the present soundscape conducive to wildlife resiliency, visitors without ear protection, and Native American visitors experiencing their traditional sites. I recommend monitoring these sites for the spectrum of ambient noise.
- 4) As a culture, we are ever increasing our involvement with technology. There is increasing concern over the impact of EMF's on wildlife, as well as human beings. It would be prudent to exclude cellular antenna or microwave apparatus from being placed on these lands.

Thank you for your attention to these concerns.

Sincerely

MAR 12 2015

San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

MAR 12 2015

BY: Lopez PM

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1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

Fragile meadows and cultural landscapes need to be protected from trails and recreational use. Of particular concern are the lichens on rocks and soil near the shores of Iceberg and Colville and on small islands. The cultural landscapes and associated plants need active stewardship.

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

Marking trails and closing off trail use, appropriate signage, outreach to visitors - including through local community volunteers, considering ex situ conservation of particularly rare plant populations, prioritizing research that supports stewardship, much more involvement of local communities. Hand clearing of encroaching vegetation in cultural landscapes & to protect rare plants.

3. What are other topics or concerns that you would like the BLM to address through the planning process?

More community involvement. Requiring that all research include local presentation of results and ~~total~~ community involvement. Take advantage of local resources. Restrict ~~pesticide~~ pesticide and herbicide applications in favor of hand clearing by interested volunteers.



4. Other thoughts or suggestions?

The islands are rich with engaged community members who can contribute to local stewardship, research and outreach. It is critical that management involve the communities and local expertise.

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Name: [Redacted]

Mailing Address: _____

Email Address: _____

Please indicate your affiliation by checking **one** of the following boxes:

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Name of organization, government, group, or agency (if applicable) [Redacted]

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Fax: 503-808-6333





SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Scoping Comment for RMP

[REDACTED]
To: blm_or_sanjuanislandsnm@blm.gov

To whom it may concern;

As a resident of the San Juan Islands, and former BLM volunteer, I have concerns about the consequences of sea level rise as it would affect Monument shorelines and wetlands. Please examine how the BLM will address this issue using current sea level rise predictions, updated predictions at appropriate intervals such as over the next 25 years, and then updated predictions through the remainder of this century in the development process of the Resource Management Plan for the San Juan Islands National Monument.

[REDACTED]



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Scoping Comment for RMP

Thu, Mar 12, 2015 at 4:26 PM

[REDACTED]
To: blm_or_sanjuanislandsnm@blm.gov

To whom it may concern;

As a resident of the San Juan Islands, and former BLM volunteer, I have concerns about the consequences of using dispersants as a means of combating significant oil spills in the marine waters surrounding the San Juan Islands National Monument. Dispersants used in the Gulf of Mexico BP oil spill have been found to more toxic to the biota of the gulf than the massive amount of crude oil that was spilled. Long term studies on efficacy and safety need to be conducted and continued before the use of dispersants can be determined to be appropriately useful in oil spill circumstances, particularly in our high current turbulent tidal waters, and complex shorelines.

Please formulate a scientifically responsible position on how the BLM will address dispersant use within it's jurisdiction and what effects such dispersant use would have on the biota, shorelines, and wetlands of the Monument in the course of developing the Resource Management Plan for the San Juan Islands National Monument.

[REDACTED]



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Scoping Comment re RMP

Thu, Mar 12, 2015 at 4:55 PM

[REDACTED]
To: blm_or_sanjuanislandsnm@blm.gov

To whom it may concern;

As a resident of the San Juan Islands, and former BLM volunteer, I have concerns about the consequences of climate change as it would affect the San Juan Islands National Monument. Please study the probabilities of increased diseases which might affect forests, meadow lands, and wetlands, including what might be expected as to food abundance and population sustainability for all species of animals inhabiting Monument lands and waters. Additionally, evaluate the potential for increased wildfires engendered by predicted temperature increases, changes in weather and rainfall patterns within the Monument's jurisdiction.

Please develop comprehensive evaluations of the range of effects that climate change might impose on Monument lands and waters in the development of the Resource Management Plan for the San Juan Islands National Monument.

Include me in your contact list for future information and updates.

[REDACTED]

San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

MAR 12 2015

Perry PM

The Bureau of Land Management (BLM) Spokane District is seeking early public input, through a process known as scoping, as it begins preparing a Resource Management Plan (RMP) for the San Juan Islands National Monument. The RMP will provide the goals, objectives, and direction that will guide the BLM's management of the National Monument for the next 15 to 20 years. The BLM defines scoping as a collaborative public involvement process to identify planning issues to be addressed through the plan. For your comment to be reflected in the scoping report, and to be the most helpful for identifying issues to be addressed during the planning effort, please ensure that your scoping comments are submitted or postmarked by **April 1, 2015**.

The BLM wants to hear from you! The following questions have been provided to help you provide the most useful comments to the BLM but all comments are welcome. Please feel free to attach additional sheets of paper if your comments do not fit below.

1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

Access through private land, storm water out fall from private developments, oil spill planning

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

forming partnerships

3. What are other topics or concerns that you would like the BLM to address through the planning process?

Doing a 100% archeological survey of BLM holdings; nominate all ^{historic} properties to the National Register of Historic places. + consult in detail with Native American tribes with patterns of traditional use of BLM lands.



4. Other thoughts or suggestions?

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Name: _____

Mailing Address: _____

Email Address: _____

Please indicate your affiliation by checking **one** of the following boxes:

- Individual (no affiliation)

 Private Organization

 Citizen's Group
 Elected Representative

 Tribal, Federal, State, or Local Government

Name of organization, government, group, or agency (if applicable) KATM

Comments may be submitted via the following methods:

Email: blm_or_sanjuanislandsnm@blm.gov

Mail: San Juan Islands National Monument RMP, P.O. Box 3, Lopez, WA 98261

Hand delivery: At a public meeting or BLM Lopez Island Office, 37 Washburn Place, Lopez Island, WA 98261

Fax: 503-808-6333



MAR 12 2015

E Remy

San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

RECEIVED
MAR 12 2015
BY: Remy

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1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

- Sea level rise + other climate related topics
- Restoration / enhancement opportunities
- Improved access / interpretation at access points
- Potential impacts of adjacent land use on monument lands

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

- Collaboration with other entities - tribes
conservation groups, recreation groups, County, etc.
- Research & science
- Land acquisition, MOU's w/ other agencies etc.

3. What are other topics or concerns that you would like the BLM to address through the planning process?

- Mammal + bird protection
- Coastal prairie protection
-



4. Other thoughts or suggestions?

Manage remote roads as wilderness

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Name: _____

Mailing Address _____

Email Address _____



Please indicate your affiliation by checking **one** of the following boxes:

- Individual (no affiliation)
- Private Organization ^{N60}
- Citizen's Group
- Elected Representative
- Tribal, Federal, State, or Local Government

Name of organization, government, group, or agency (if applicable) Friends of the San Juan Islands *

Comments may be submitted via the following methods:

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Hand delivery: At a public meeting or BLM Lopez Island Office, 37 Washburn Place, Lopez Island, WA 98261

Fax: 503-808-6333

Note - these are my personal comments, not FSI formal comments.



Comments for RMP Scoping Document

Submitted by Tim Clark

719 Vista Road

Lopez, WA 98261

tclark@rockisland.com

Please contact by email. I will view documents on the web. Do not withhold personal information.

Comments: From the lack of an RMP and from the list of preliminary issues identified by the BLM, it is obvious that BLM holdings in the San Juan Archipelago are atypical and deserve special consideration. BLM lands in the San Juan Islands have no shrub-steppe habitat or livestock grazing. Issues that are important in the San Juans include prevention of noxious weeds, overuse by recreational users, and protection of upland habitat for salmonid species, marine mammals, and seabirds. The San Juan Archipelago is relatively unspoiled, and the focus needs to be on protection and conservation rather than restoration and mitigation. The RMP needs to provide management for a possible National Conservation Area, which appears feasible and likely; if not, the RMP will be a wasted effort for this area.

Specific decisions that will need to be addressed in the San Juans include:

- management to maintain or contribute toward the restoration of old growth forest stands,
- maintenance of desired habitat conditions conducive to game species and migratory bird species,
- recognition and use restrictions to maintain suitable upland habitat for salmonid species food sources,
- use restrictions that promote respectful cultural resource protection,
- delineation of lands that are not available for livestock grazing, mineral extraction, and energy production in order to protect other resources.

Although I do not live in eastern Washington, I have some of the same concerns as BLM regarding habitat, species of concern, energy development, and recreation. In general, priorities must be given to habitat maintenance and restoration when allocating resources. As an example, this would mean noxious weeds would get funding before trails, and that grazing management would come before selling grazing rights. Habitat and species restoration and maintenance is a necessity; renewable energy development is a possibility; and recreation is a luxury.

Consolidation is worthwhile if it does not alienate neighbors and stakeholders. It may be easier to manage large blocks of land, but neighboring lands can be an inexpensive asset if the landowners are in agreement with BLM resource management. Working with neighbors is often cheaper than buying them out.

The word “sustainable” is used too often these days, but the concept cannot be used too much. Write a plan for the next 100 years, not the next twenty. Don’t play catch-up – think of setting in place. What is the vision of BLM lands a century from now, and how do we get there?

Thank you for the opportunity to contribute. I look forward to further communication.

Sincerely,

Tim Clark

San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

RECEIVED
MAR 13 2015

BY: Orcas P.N.

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1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

Recreation will need careful management the uniqueness of these places is of precious value that is beyond recreation. Remember Orcas public chose to let Faulers pond be for birds + not pedestrians - this is reflecting an important value + will inform the plans.

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

possible lottery for visitors if/when impact needs to be reduced.
Have a consistent approach open communication? Like you have.
Community Participation, involve youth
Interpretive outreach

3. What are other topics or concerns that you would like the BLM to address through the planning process?

Archeological resources, cultural resources - Care
Science Research opportunities (+ management of)
oil(etc.) Spill protection plan
forage fish consideration
DNA collection monitoring + seed banking
soil mapping? midden maps etc.



4. Other thoughts or suggestions?

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Name: _____

Mailing _____

Email Address _____

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 Private Organization
 Citizen's Group
 Elected Representative
 Tribal, Federal, State, or Local Government

Name of organization, government, group, or agency (if applicable) _____

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Hand delivery: At a public meeting or BLM Lopez Island Office, 37 Washburn Place, Lopez Island, WA 98261

Fax: 503-808-6333



San Juan Islands National Monument
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MAR 13 2015

ORCA PM

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RX Buen as a management tool for noxious weeds + ecological health forest BMP + scientific contribution. This may influence the larger picture in a good way and is a noxious weed TR that may be more effective. Also who knows which seeds may benefit!

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

Use Protection Island Plan to inform this process - This plan is very in depth + comment rich + will be helpful in shaping the Nat. Monument Plan.

Keep up the good work with Public Association + Query

Keep your co-operative interagency tone, global tone.

3. What are other topics or concerns that you would like the BLM to address through the planning process?

continued Invite first Nations input
HAVE a booth in the Farmers Markets - maps!
Comus history + research
Work w/ our museums to get info ↑ before more of our elders pass over. ASAP; history is getting lost



As you know: Rabbit + deer will need ATR...
pesticide herbicide use on marine system = Yike

4. Other thoughts or suggestions?

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Mailing _____

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MAR 13 2015

San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

BY: *Arkas PM*

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1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

I get worried about all the foot traffic on Indian Island. The oyster catcher situation tree loss, trail braiding, have been problematic. It is a tricky balance ...

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

*- UNSURE here needs ~~more~~ conversation
Key point is it is an opportunity for outreach.*

3. What are other topics or concerns that you would like the BLM to address through the planning process?

*- Microplastic - COASST is coming out with new protocols within the next 2 months - Let's get these lands on the Plastic Survey Radar.
→ COASST @ UW Hilary.*



4. Other thoughts or suggestions?

Thank you
Well done All of you ♡

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Lauren and Mark:
As a forester and Orcas Island resident,
and remover of invasive and noxious weeds
in Moran State Park and San Juan Islands National Monument
on four SJ Nat. Mon. islands, Resource Management Plan
I would like to be active on a working group or sub-committee working on these areas of interest.

Phil Branch ^{forester}
phil@philbranch27@gmail.com
360-376-8588
cell 360-298-6015

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1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

Please consider encouraging the development of a volunteer citizens' group of maybe "Friends of SJNM" with an organizational framework that flexibly allows formation and dissolution of sub-groups like "Trails", "Signage", "Vegetation Management," etc.

2. What are some approaches to addressing these issues that the BLM should consider through the planning process? For forest and shrubland management, how about the following?

1. As wildfire control and firefighting access, create some firebreaks on islands large enough to need it:
a) along trails, and elsewhere, as needed, create firebreaks, maybe 20 ft. to 40 ft. wide, by thinning out many trees, pruning up to 15 ft. ^{or more} on the trunks of the few remaining trees, remove most shrubs, leaving a few in scattered small bunches at random spacing, to look natural; and then plant native short grasses and flowering forbs such as fescues, comas, violets, strawberries and lilies.

3. What are other topics or concerns that you would like the BLM to address through the planning process?

1. continued:
If firebreaks are created, in similar manner, through woods and brushlands not along trails, they might appear natural by being laid out (meandering over the landscape, and made of varying widths: for example:



continued ->

Vegetation management

4. Other thoughts or suggestions?

Since Native peoples, before European invasion, often used controlled fire to encourage food and medicinal plants, and probably to improve landscape conditions for hunting as well, we should also consider also manipulating small parts of the landscape to open vistas, to increase diversity of plants and animal uses, and to reduce a few of the large expanses of unbroken forest; Especially along trails, roads, vista balds, and along shorelines - especially at points of boat access.

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Name: [Redacted]

Mailing Address: [Redacted]

Email Address: [Redacted]

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Name of organization, government, group, or agency (if applicable): [Redacted]

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Fax: 503-808-6333

RECEIVED
 MAR 14 2015
 BY: Anacortes Public Meeting





SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Comments on the RMP

Sat, Mar 14, 2015 at 9:52 PM

To: blm_or_sanjuanislandsnm@blm.gov

Dear BLM

I am a resident of Lopez Island and one of my great joys is visiting the San Juan Islands National Monument units on the island including Iceberg Point and Point Colville. I appreciate the opportunity to comment on the Resource Management Plan that the BLM is developing.

I ask that you consider expanding recreational activities at Iceberg Point and Point Colville to include mountain biking. Mountain biking is explicitly prohibited. MB opportunities on Lopez are very limited today, mostly on Lopez Hill.

I understand that there is a history of bad encounters between unruly MBs and hikers in some locations. The MB community has put a good deal of effort into educating MBs and is willing to self-police. To further reduce the opportunity for unacceptable encounters some areas have implemented rules such as:

- Limit MBs to certain trails.
- Limit MB travel to a specified direction if deemed appropriate for safety.
- Limit MBs to certain days a/o times, e.g. Tuesday and Thursday from 1PM until closing.

In addition I would support excluding MBs as determined by the local manager during the wet season to avoid trail erosion.

Thank you for the opportunity to comment.

regards

[REDACTED]
Lopez Island



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Comments on the Resource Plan

[REDACTED]
To: "blm_or_sanjuanislandsnm@blm.gov" <blm_or_sanjuanislandsnm@blm.gov> [REDACTED]

Dear BLM

I am a resident of Lopez Island and one of my great joys is visiting the San Juan Islands National Monument units on the island including Iceberg Point and Point Colville. I appreciate the opportunity to comment on the Resource Management Plan that the BLM is developing.

As stated in President Obama's Proclamation,

"The protection of these lands in the San Juan Islands will maintain their historical and cultural significance and enhance their unique and varied natural and scientific resources, for the benefit of all Americans."

One of the greatest threats to preserving these values is the intrusive noise from Navy Growler jets flying out of Naval Air Station Whidbey Island.

I appreciate that the Monument with the BLM filed comments in the Navy Growler EIS. My observation is that your sister agency in the Department of Interior, National Park Service, Pacific West Region, submitted comments that address noise and the acoustic environment in greater detail. I encourage the Monument to partner with NPS in future comments, such as when the Navy Draft EIS is released.

I understand that the Proclamation states

"Nothing in this proclamation shall be deemed to restrict safe and efficient aircraft operations, including activities and exercises of the Armed Forces and the United States Coast Guard, in the vicinity of the monument."

That does not relieve the Navy of their obligations under the National Environmental Policy Act to analyze the impacts of their proposed expanded activity at NAS Whidbey Island on the Monument and to fully consider alternatives and mitigation measures that would reduce the harm.

Thank you for the opportunity to comment.

Sincerely

[REDACTED]
Lopez Island



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

No Monsanto Poison & Stop the Growlers at Whidbey Naval Air Station fem Desecrating OUR Monument - Scoping Comment

Sun, Mar 15, 2015 at 1:14 PM

[REDACTED]
To: blm_or_sanjuanislandsnm@blm.gov

To whom it may concern,

Action needs to be taken NOW:

1. To prohibit all use of herbicides and pesticides, such as "Round Up" on all Monument properties *and* all adjacent properties where these products can be expected to cause damage to the Monument's properties and its wildlife, fish, flora and fauna; and
2. To stop Whidbey Naval Air Station (WNAS) from continuing its daily assault on the Monument's properties and its wildlife, fish, flora and fauna caused by Jet Noise, Jet Rumble and Jet Fuel, especially the Monument properties located in the southern portion of Lopez Island. We cannot wait for protective action from other governmental agencies that are currently reviewing the detrimental impacts of the noise and other problems caused by WNAS and its Growlers in the course of the pending environmental scoping which we know will take years to complete. Our Monument properties and the resident wildlife, fish, flora and fauna need protection, *now*, to prevent the ever-increasing and permanent damage being caused daily by WNAS and its jets.

Thanks.

[REDACTED]

3/14/15

Dear Board Members for Resource Management

San Juan Islands National Monument and BLM lands,

I was unable to attend the meeting recently held on Lopez but am thankful to still have the opportunity to weigh-in on the issues concerning these public lands.

I have lived on Lopez for over 35 years and was instrumental in the prevention of the planned logging of the BLM lands surrounding Watmough back in the mid 1980's. Essentially, I alerted Lopez residents and organized walks to witness what was about to take place. From there, important work was done to keep it untouched.

Since the saving of the forests of those days until present, I (like most) still care deeply about these lands. I was not at all happy when "management" came to Watmough. A wild place should stay wild. This is *THE* most important lesson any human visitor can gain from a visit to a wild place. The trails in and around the hill and bay went from being an adventure in exploration, to something more akin to a stroll in an arboretum – immaculately preened trails, wacked-back vegetation, rock-lined "avenues", and the graveling of our once magical earthy path leading to the beach.

I used to walk with my young children through the deep, lush salal and tell them they were being caressed by nature. I'd lift them onto my shoulders where it became too deep in vegetation. It was about "magic". Now the trails are so cut back, one can hardly reach to touch the plants on either side.

I mourn the National Monument status for what I imagine will be the increased emphasis on this taming and trampling of the wild...more signs? Kiosks to buy trinkets? Entry fares? Surely larger parking lots. Surveillance cameras? More and more monitors? And most harmful of all; the huge increase in human visitors, who will "love it to death"!

Even having paid employees on these lands mean un-needed jobs will be performed just to keep them busy. The only real job I see of value in these wild areas is garbage control and fire patrol.

Question:

Do funding's for National Monument status mean an incumbent need for increased tourists? Is there a dictum to increase publicity and attention to new national monument holdings?

Please, I beg! Keep these lands as wild and wonderfully unkempt as possible.

Thanks to each of you on the board for taking input on this subject so dear to my heart!

Sincerely,

██████████

San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

RECEIVED
MAR 16 2015

BY: Lopez Office

BLM

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1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

We'd like to see the lands preserved as they are now, rather than restore them to some past condition.

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

The public needs to be educated regarding the ecological importance of these lands. They were originally preserved as ACEC lands (those on Lopez) so have special attributes that should be preserved.

3. What are other topics or concerns that you would like the BLM to address through the planning process?

On Lopez parking needs to be addressed, especially at Iceberg Pt. and Chadwick Hill/Wetlands. (Watmough is OK since its parking lot upgrade.)



4. Other thoughts or suggestions?

Side trails are being created by the public going off the main trail because of lack of definitive marking. Somehow we need to keep people on the main trails only.

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Name: _____

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SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

San Juan Islands National Monument Scoping Statement

Mon, Mar 16, 2015 at 11:35 AM

To: blm_or_sanjuanislandsnm@blm.gov

Cc: "deChadenedes, Marcia" <mdechade@blm.gov>, Nick Teague <gteague@blm.gov>

Dear Ms. Pidot,

As a former USCG Electronic Technician with time in the Bering Sea and an Amateur Radio Operator - education, communication and an awareness of science and one's environment is key to the future of the Salish Sea and all it's life. The San Juans National Monument with it's multifaceted responsibilities is an important participant - as well as a potential change agent - in this future. As a long-time "student" of "Futurism," a recent place to start is the 2014 Salish Sea Ecosystem Conference Keynote by OSU Professor of Fisheries Robert T. Lackey. His number one point:

"Assuming governmental policy regarding migration remains unchanged, then the population of Salishland, currently 9 million, in 2100, will be 25 to 30 million.

"You heard right. 9 million today, 25 to 30 million in 2100. A tripling, or more."

- <http://fw.oregonstate.edu/system/files/u2937/2014x%20-%20Four%20Realities%20-%20Salish%20Sea%20Conference%20Keynote%20-%20Lackey%20-%20May%201,%202014.pdf>

For the past five years I have been a volunteer at Patos, and now also at Burrows Island, Light Stations. These, and the other "Light Stations" of the Salish Sea still have a role to play in the understanding, safety, and preservation of life in our aquatic region. One exemplary example of the potential uses of an "old Light Station" is that of Race Rocks by the United World/Lester Pearson College:

<http://www.racerocks.ca/wp/home/>

One annual event which features the use of worldwide communication at these "Light Stations" is the International Lighthouse and Lightship Weekend (ILLW) during which temporary Amateur Radio Stations are established to bring attention to both Light Stations and a science, technology, engineering and math (STEM) oriented "hobby."

Then there is the need for emergency preparedness; the Amateur Radio motto is: *"When All Else Fails."* Three days ago I attended the monthly San Juan County Amateur Radio Society meeting in Friday Harbor. Special guests were the new Sheriff and the Director of the County Department of Emergency Management. Both related that after a major disaster - an earthquake and tsunami for example - the Islands will largely be isolated for days, if not longer. I am also writing this in the midst of a major disaster caused by the strongest tropical storm/typhoon/hurricane ever to hit the Pacific.

Onean message from 24 hours ago:

There is only one resident radio amateur on Efate Island in Vanuatu, Rod YJ8RN.

He is not active on air, and there are no other radio amateurs resident.

Vanuatu is an archipelago of more than 80 islands.

Communication systems are down, and as the news comes in it gets worse and worse. It appears that Port Vila is almost totally destroyed, and similar on the other islands.

Aid has started to arrive from Australia and others. Rapid response teams are on their way to the outlying islands to assess the situation.

All we can do is donate to the aid agencies involved, as suggested already. This is likely to be the worst



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

scoping comments re RMP San Juan Islands National Monument

Tue, Mar 17, 2015 at 10:54 AM

[REDACTED]
To: sanjuanislandsnm@blm.gov

Hello,

I have been a resident of Lopez island for 33 years. I am thrilled that the BLM lands here have been granted National Monument status. My comment is simple: leave the land alone! I have noticed over the course of my years on Lopez that there seems to be a compulsion to create ever more access, trails, advertising and parking for public land--all, I'm sure, with the best of intentions. However, more people means more damage to the ecosystem, the animals that live there, and sites sacred to natives who used to inhabit these islands. Currently, the BLM has created a trail right through the middle of a native graveyard. The only way to "manage" the fragile ecosystems of these gorgeous and pristine lands is to leave them in their natural state. I worked at the ferry landing for 15 years and I can't begin to describe the terrible damage inflicted on the trees and land through the thoughtless acts of tourists. Many madrona trees are dead and dying from being carved, trash is littered everywhere, and cigarette butts are left burning. This is what we have to look forward to on National Monument lands if the BLM decides to put in public parking, interpretive trails, and heavy advertising.

Please, think about the land first, people and their entertainment second!

Thank you,

[REDACTED]
Lopez Island, WA



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Place names

Wed, Mar 18, 2015 at 1:48 PM

To: [REDACTED], info@sanjuanislandsnm.org

From email exchanges over the last few years with Russel Barsh, I am aware of numerous rocks or small islands in the San Juans that carry local or informal names. A few examples: Iceberg Point Rocks, Outer Bay Rocks, Trincas Island in Westsound, Indian Island in Eastsound, Pear Point Rocks, Dinner Island Rocks, Pudding Island. None of these are approved names and thus, may not appear on federal documents (e.g., charts or topos).

As BLM will be managing some of these, I think identifying these locations (as well as formalizing their names) would be an important activity. I would enjoy being part of the process.

[REDACTED]



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Scoping Comment

Thu, Mar 19, 2015 at 8:42 PM

To: blm_or_sanjuanislandsnm@blm.gov

Thank you for considering my comments regarding the Resource Management Plan (RMP) for the San Juan Islands National Monument. I grew up on Lopez Island and my relationship with the four main Monument lands on Lopez Island: Iceburg Point, Whatmough Bite, Point Coleville and Chadwick Hill goes back to before they were public or widely known outside of the local community. I have seen the impact to the landscape and to the relationship between the local community and the lands. These four places are the most accessible of the Monument lands and I think warrant special consideration.

1) Iceburg Point, Whatmough Bite, Point Coleville and Chadwick Hill have been places that the Lopez community I know has used for social gatherings, celebrations, contemplation and sacred space. I have been to weddings at Whatmough, memorials at Iceburg, circles of song and silence at Coleville and spent three days and two nights fasting on top of Chadwick Hill during a time of deep personal questioning. We often hear about how place and landscape was sacred to the native peoples. I think it is important for the RMP to recognize that these places have not only been sacred historically but continue to be in the contemporary Lopez culture. As these lands have become more assessable and "discovered" I have noticed that they are used less for community gatherings of a contemplative or sacred nature. I request that the RMP acknowledges the living spiritual connection between the Lopez Community and these lands and creates an avenue for them to be legally used for such purposes as solo visioning retreats, coming of age ceremonies, memorials, and celebrations marking the Solstices and equinoxes.

2) Iceburg Point and Whatmough Bay are the more well known of the Lopez monument lands. Point Coleville and Chadwick Hill are not as frequented or known and I request that the management of these two places attempt to preserve this. I believe this could be done with minimal signage, minimal or no featuring in print material and no media attention directed to these sites. They will of course be on the map, but we can decide to manage them in a way that does not draw additional attention.

3) I request that the signage used be low visual impact.

4) As more visitors use these sites I notice the increase in trails, especially at Iceburg, and request low impact signage asking people to stay on designated trails.

Thank you for your consideration.

[Redacted signature block]



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Scoping Comment NML

Fri, Mar 20, 2015 at 3:44 PM

To: blm_or_sanjuanislandsnm@blm.gov

Thank you for considering my comments regarding the Resource Management Plan (RMP) for the San Juan Islands National Monument. I have lived on Lopez Island for almost 30 years.

I have seen the impact to the landscape and to the sacred relationship between the local community and the lands over this time.

I used to go to Whatmough bite often for quiet contemplation, now it is so full of people at all times of years playing frizbe, yelling, dogs running, it has lost all its quiet sacredness. Maybe a sign here that lets the public know how much of a natural echo exists here and how the natural sounds resonate here is a special element of this particular Monument land.

The Lopez Community has a very special spiritual connection to these lands. We are organized as the "Cloud House People" and have a formalized way of celebrating the changing seasons and the "coming of age" of our youth.

I request that RMP acknowledges the living spiritual connection between the Lopez Community and these lands and creates an avenue for them to be legally used for such purposes as solo visioning retreats, coming of age ceremonies, memorials, and celebrations marking the turning of the earth seasons.

I think it is important for the RMP to recognize that these places have not only been sacred historically but continue to be in the contemporary Lopez culture. As these lands have become more assessable and "discovered" I have noticed that they are used less for community gatherings of a contemplative or sacred nature.

2) Iceburg Point and Whatmough Bay are the more well known of the Lopez monument lands. Point Coleville and Chadwick Hill are not as frequented or known and I request that the management of these two places attempt to preserve this. I believe this could be done with minimal signage, minimal or no featuring in print material and no media attention directed to these sites. They will of course be on the map, but we can decide to manage them in a way that does not draw additional attention.

3) I request that the signage used be low visual impact.

4) As more visitors use these sites I notice the increase in trails, especially at Iceburg, and request low impact signage asking people to stay on the designated trails.

Thanks for Listening,
Sincerely,



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

San Juan Islands National Monument Resource Management Plan Scoping Comment Form

[REDACTED]
To: blm_or_sanjuanislandsnm@blm.gov [REDACTED]

1. Conservation measures for fragile properties are well known, having been well established years ago and must be faithfully adhered to.
2. Concerning this particular property, ANY WALKING off trail, from the woodland trails to the waterfront, will rapidly destroy the lichen and other mini-flora covering the rocks. This eco-system is unique, and is not recoverable after its loss - the only management of these areas is severe trail adherence. If on-trail control is not absolute - including children, household pets, hunters - the Monument will be rapidly reduced to multiple-trailed forests, barren rock, and beautiful views of the ocean.
3. Intense noise has been established in the medical literature to cause stress-induced disease and malfunction on all sentient creatures - in this case especially birds - not to mention the human visitor. The noise of naval activities is not compatible with the health of the environment.

[REDACTED]

Individual (no affiliation)



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Scoping Comment: Resource management plan (RMP) for the San Juan Islands National Monument.

Sat, Mar 21, 2015 at 9:04 PM

[REDACTED]
To: BLM_OR SanJuanIslandsNM <blm_or_sanjuanislandsnm@blm.gov>

I am writing to ask that the planning process include examination and consideration of the effect of jet noise on the integrity of the San Juan Islands' Monuments, and on the use and enjoyment of those places.

Last week there was a day of excessive jet noise from Naval Air Station Whidbey Island. It felt like a wall of noise combined with vibration. Such days are not unusual, but this day reminded me of those times when I have wanted to enjoy Iceberg Point - my favorite - and could not because of the oppressive noise. In fact, I no longer invite friends from the mainland over to Lopez for a walk at Fort Colville or Iceberg Point because I cannot predict whether it will be enjoyable or not, and most often it is not. Why visit a place that feels like a war zone?

Thank you.

[REDACTED]



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

RMP for SJINM

[REDACTED] [REDACTED]
To: "blm_or_sanjuanislandsnm@blm.gov" <blm_or_sanjuanislandsnm@blm.gov>

Marcia et al,

Greetings.

I am pleased to be able to provide comments for the resource management plan (RMP) that is being prepared for San Juan Islands National Monument. I have two areas of interest: 1) that of a property owner who adjoins BLM land; and 2) as an ecologist interested in the proper long-term management of the unique ecosystem found on the BLM-owned San Juan Island properties.

Item 1: Adjoining Property

My property, [REDACTED] on Lopez Island directly abuts an unimproved easement that BLM owns to access trailheads to Chadwick Hill. This is the only other trail access to Chadwick Hill (that I know of) beside the main Watmough Head trailhead. At present, the aforementioned trailhead off of Watmough Head Road crosses private property, wandering outside of the official easement. Making the easement passable would require logging and brush clearing. At present there is no sign on the main road indicating the location or whereabouts of the official trailhead. Sometimes tourists appear quite lost as they wander across my neighbors' pasture trying to locate the trailhead. At some point I expect visitation will be significant enough that improvements will have to be made to this easement. I hope that when that time approaches local property owners will be included as stakeholders and parties of record in the scoping and improvement planning process.

Item 2: Ecosystem Management

The Watmough, Point Colville and Iceberg Point units represents different ecotypes and I hope that is factored into the RMP. I think that Iceberg Point may be North Pacific Oak Woodlands, which are the driest forest/woodland type on the landscape. The Watmough and Colville represent North Pacific Dry Douglas-Fir-(Madrone) Forest and Woodland which are slightly moister along the dry-wet gradient in western WA. The latter might contain sporadic oak but its predominantly Madrone and/or Doug-fir. Attached is link to a report prepared by Joe Joe Rocchio, Vegetation Ecologist with the Washington Dept. of Natural Resources, Natural Heritage Program. This report was produced for San Juan National Historical Park (click on Vegetation panel at bottom of this link to download file: <http://science.nature.nps.gov/im/units/nccn/parks/sajh.cfm>). The colors aren't the best but you can see that North Pacific Dry Douglas-Fir-(Madrone) Forest and Woodland (labeled on the map as Pseudotsuga menziesii – (Arbutus menziesii) Forest & Woodland Alliance) is one of

the predominant types at English camp (p. 186) while North Pacific Oak Woodlands (labeled as Quercus garryana Woodland Alliance) are only found at Young's Hill on west/south facing slopes. That report also has descriptions of many of the associations found on San Juan Island (and likely other islands), including their biodiversity values (i.e., Global (G) and State (S) conservation status ranks).

A couple of other resources that might be helpful:

1. The oak-grassland GIS layer that Chris Chappell put together many years ago. Ecological Systems are NOT used in the legend but it is a much more accurate map for identifying where oak patches occur. That layer can be downloaded here: <http://www1.dnr.wa.gov/nhp/refdesk/gis/index.html>
2. Chris Chappell also did a report on biodiversity values of many of the BLM-managed islands in the San Juans (attached). I'm guessing (hope) BLM has used that in their plan development but maybe they need a reminder that the report exists...

Just for clarification the San Juan veg map and Chappell's BLM island report use U.S. National Vegetation Classification plant associations which are different classification units. The latter are finer-scale but generally are nested in Ecological Systems (although in some case not strictly 1:1).

Please let me know if you have any questions! [Good luck. I look forward to seeing the results of your work.](#)

[Redacted text block]

4/9/2015

DEPARTMENT OF THE INTERIOR Mail - RMP for SJINM

 771K



**Biodiversity Significance of BLM
on Patos and Little Patos Islands
Carter Point, Lummi Rocks and
South end of Eliza Island**

Prepared for Bureau of Land Management,
Spokane District

Prepared by
Rex C. Crawford and Chris B. Chappell

October 2006



**Biodiversity Significance of BLM properties on
Patos and Little Patos Islands, Carter Point, Lummi Rocks and
south end Eliza Island, Washington**

Prepared for
U. S. Bureau of Land Management,
Spokane District

Rex C. Crawford, PhD
Chris Chappell

Natural Heritage Program
Washington Department of Natural Resources
Olympia, WA 98504-7014

October 2006

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Introduction

The Spokane District, Bureau of Land Management manages over 800 acres of island land in San Juan and Whatcom Counties, Washington. The primary management objective of all these BLM lands is to preserve their natural value. Two areas on Lopez Island are Areas of Critical Environmental Concern and Patos Island has been considered for its wilderness values. BLM in 2005 had plant community maps and plant species lists for the Lopez ACECs, but only cursory information on the other areas. The objective of this report is to summarize the statewide biodiversity significance of Patos and Little Patos Islands, Lummi Rocks, Carter Point of Lummi Island, and southern Eliza Island BLM sites based on a previously provided GIS layer of vegetation communities on those areas.

This report summarizes the results of site inventories and evaluations of western Washington BLM properties on Patos and Little Patos Islands, Carter Point, Lummi Rocks and the southern end of Eliza Island. Washington Natural Heritage Program (WNHP) ecologist Chris Chappell conducted and coordinated inventories in 2004-2005 and summarized the results into the WNH Information System. WNHP ecologist Rex Crawford synthesized that information for this report.

Methods

For each area, polygons were first delineated based on the most current available aerial photography and any information previously collected for an area. Polygons at each site were then visited in the field and characterized by four overall dominant vegetation categories, three land use or site descriptive categories, and estimated percent of polygon occupied by very plant association. Four additional variables for plant association in a polygon were assigned. A total of 13 variables were addressed per polygon including intensity of survey and are provided as attributes of a GIS layer.

Plant associations at each area are classified or linked to the National Vegetation Classification maintained by NatureServe (<http://www.natureserve.org/explorer>). This classification meets the current (1997) Federal Geographic Data standards. These “plant associations” differ from “plant associations” as described on National Forests in that they refer to existing vegetation rather than potential vegetation. Where more recent classifications have been developed than those on NatureServe, correlation with and relationships among classifications are presented in the discussion of each type.

Plant associations tracked by the Washington Natural Heritage Program are mapped as “occurrences” based on specifications of area occupied and ecological condition. Often plant associations occur as landscape mosaics or patterns with other associations at a scale too fine to accurately or practically delineate. As a result, occurrence maps of plant associations may overlap with other plant associations or represent the distribution of more than one association.

Conservation status of the plant associations referred to in the fact sheets as **global/state status** follows NatureServe terminology. The primary factors for assessing status are: total number of occurrences of the association and total acreage occupied by the association. Secondary factors include geographic range over which the community occurs, threats, long term trends, degree of environmental specificity, and ecological integrity of the occurrences. The conservation status ranks are as follows (G ranks refer to global ranks, S ranks refer to state ranks):

G1 Critically Imperiled

G2 Imperiled.

G3 Vulnerable

G4 Apparently Secure

G5 Demonstrably Secure

G#G# Range Rank—A numeric range rank (e.g., G2G3) is used to indicate the range of uncertainty in the status of a species or community.

GNR Unranked—Global rank not yet assessed.

Within the text, plant associations names may be shortened to acronyms of nominal species composed of the first two letters of the genus and species, for example, POBA/COSE = *Populus balsamifera* var. *trichocarpa* / *Cornus serotina*. A full list of associations by acronym name, common name and scientific name appears in the appendix at the end of the report.

BLM area Descriptions

Patos and Little Patos Islands, San Juan Island County

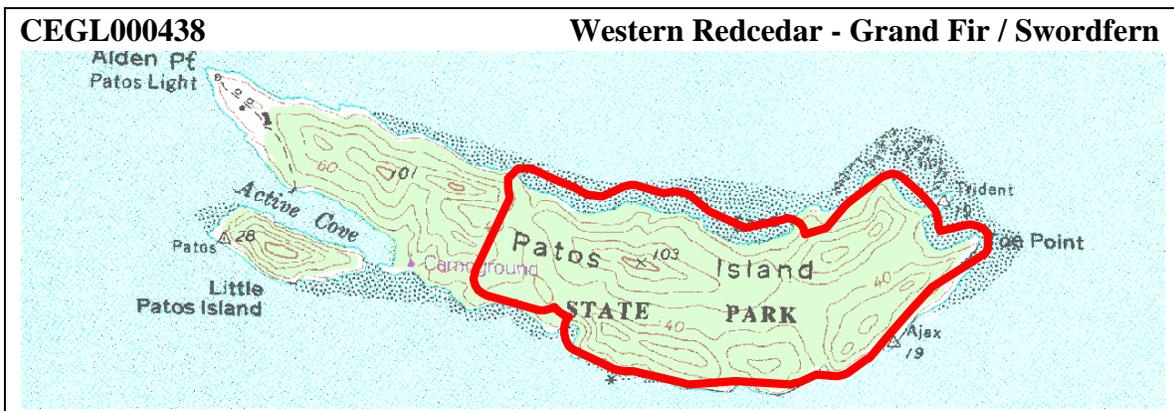
The 2005 survey of Patos and Little Patos Islands verified and expanded upon a 1986 Natural Heritage inventory. The islands are largely forest-dominated and undeveloped except for campgrounds and an old lighthouse near the western end of Patos Island. A foot trail passes through the forest near the western end of Patos Island. Both islands support high-quality forest occurrences and small, poor-quality native grasslands. Non-forested areas on both islands total less than 10 acres and exotic grasses and forbs dominate the vast majority of those areas. The Washington Natural Heritage Advisory Council in 1987 recommended the forested portions of both islands for Natural Area Preserve designation. The current inventory supports that recommendation and that BLM consider Research Natural Area or a similar designation for portions of Patos and Little Patos Islands.

Management Comments: Recreational use of the trail corridor and possible impacts such as non-native species introductions along this corridor should be monitored. Possible threats to forested habitats, if they become established on the islands, are the non-native English ivy (*Hedera helix*) and herb Robert (*Geranium robertianum*).

Four forest association occurrences are present on the Patos Islands:

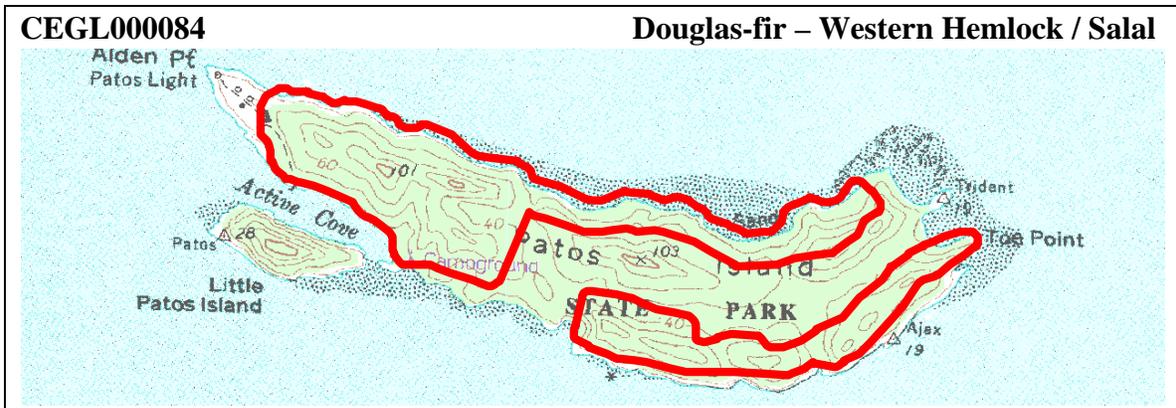
Western Redcedar - Grand Fir / Swordfern (*Thuja plicata* - *Abies grandis* / *Polystichum munitum*) Forest association. Global Rank: G1G2 State Rank: S1.

This association has a very limited global range. There are fewer than five high-quality occurrences known in Washington. Threats to the type include non-native species and further development associated with urbanization. The occurrence on Patos Island is the **best example of its type known in the state**. This old-growth and mature forest (145 year old) has never been logged. The entire area appears to have burned since establishment of the old-growth cohort, though pockets on its eastern third may support older trees. This type occupies approximately 85 acres on a gently sloping to rolling plateau-like landform in the center of the island. This occurrence includes a small transition association, mapped as THPL-ACMA-ABGR/(OECE)/POMU (see appendix), which is more common in on Vancouver Island. Its eastern third feeds into a depression, much of which is occupied by a different community types with cottonwood and wetter soils (ALRU/POMU, POBA/RUSP/POMU and POBA/COSE map units). A small wetland dominated by Pacific willow (*Salix lucida*) is included in the mapped association.



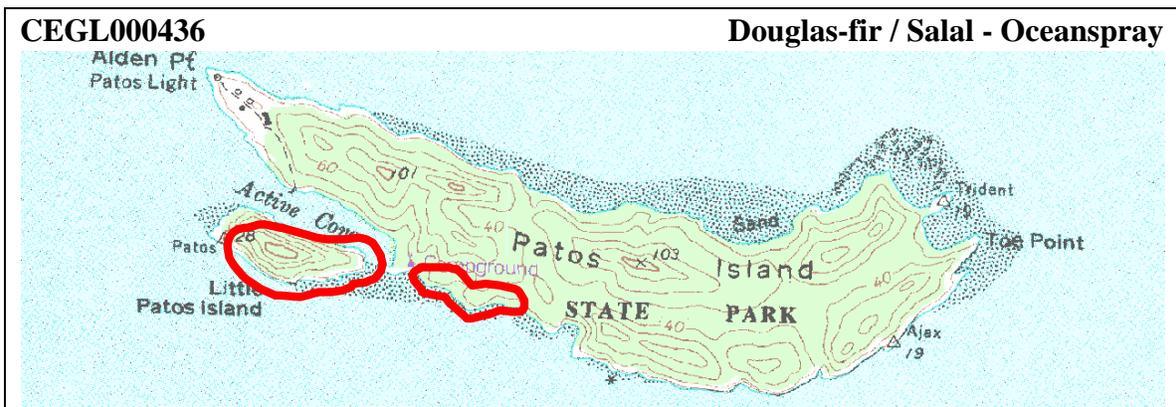
Douglas-fir – Western Hemlock / Salal (*Pseudotsuga menziesii* - *Tsuga heterophylla* / *Gaultheria shallon*) Forest association Global Rank: G3 State Rank: S2. (This classifies as *Pseudotsuga menziesii* - *Tsuga heterophylla* / *Gaultheria shallon* – *Mahonia nervosa* / *Polystichum munitum* in the newer classification of Chappell 2006).

Natural-origin occurrences of this association are rare in the Puget Trough due to historic logging. In adjacent ecoregions, it has been less impacted by development and logging. The Patos Island occurrence is old-growth and mature forest with scattered old trees that initiated following a fire. Although this stand on Patos Island lacks western hemlock, it is included in the variation of the type and is primarily mapped as PSME-THPL/GASH-MANE/POMU and PSME-THPL/MANE-GASH/POMU. The association is found in a mosaic with western redcedar - grand fir / swordfern and western redcedar/salal associations. This type occupies approximately 70 acres on the gentle slopes and rolling topography on Patos Island.



Douglas-fir / Salal - Oceanspray (*Pseudotsuga menziesii* / *Gaultheria shallon* - *Holodiscus discolor*) Forest association Global Rank: G2G3 State Rank: S2.

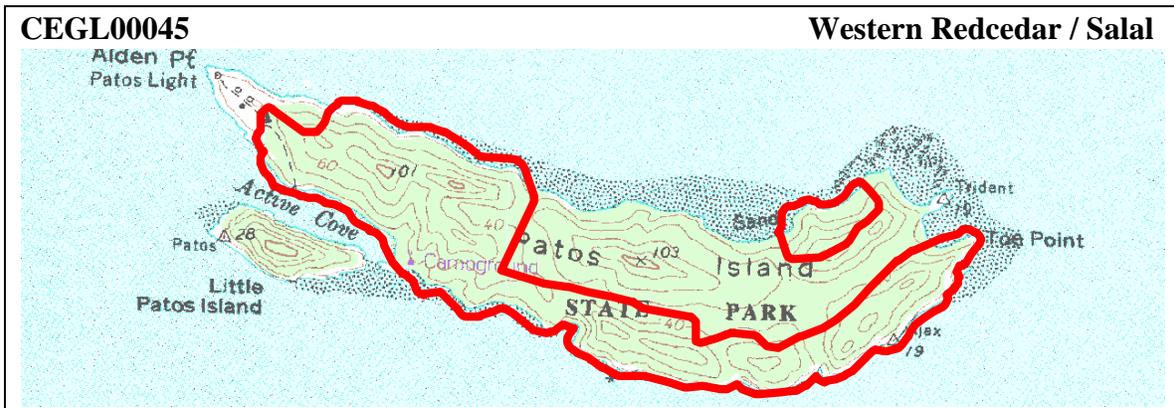
Few occurrences of relatively good quality remain of this association: 17 are known in Washington. This mature post-fire Douglas-fir stand with scattered old trees (approximately 125 years old) appears on Patos and Little Patos Islands. Smaller Pacific madrone (*Arbutus menziesii*) trees appear in the subcanopy. This small four acre occurrence is in good condition. Very few to no exotics are present on Little Patos, and few velvetgrass (*Holcus lanatus*) plants appear in the occurrence on Patos Island. This forest appears on the gentle to moderate southeast to southwest aspect slope and broad flat ridgetop on Little Patos and Patos Islands. It appears in transition to forest communities with grand fir in the overstory and overlap with map units PSME-ABGR/HODI/POMU on Little Patos and PSME-ABGR/GASH on Patos Island.



Western Redcedar / Salal (*Thuja plicata* / *Gaultheria shallon*) Forest association Global Rank: G1G2 State Rank: S2. (This is *Pseudotsuga menziesii* - *Thuja plicata* (*Abies grandis*) / *Gaultheria shallon* and *Pseudotsuga menziesii* - *Abies grandis* / *Gaultheria shallon* in the newer classification of Chappell 2006).

There are only eight high-quality occurrences of this association known in Washington and it has an equally limited geographic range on Vancouver Island. The occurrence on

Patos Island is a mix of mature stands with scattered old trees and old-growth stands. The mature cohort of trees established following a mixed severity fire that burned the whole occurrence. This 30 acre occurrence is located on flat to rolling plateau-like landform and forms a mosaic with a Douglas-fir – Western Hemlock / Salal association. Douglas-fir is an important component of this occurrence and appears as map unit PSME-THPL-ABGR/GASH. This occurrence is adjacent to the campground on the west end of the Patos Island and has a trail passing through it.



Other map units that appear on Patos islands are:

- 1) cover types that represent variation with an association (PICO-PSME, PSME Savanna map units),
- 2) areas too small to be fully representative of an association (PICO-PSME/GASH, PSME-THPL/HODI-SYAL, PSME/HODI-SYAL, PSME/HODI-SYAL, PSME-ARME/GASH, and PSME-ARME/GASH map units),
- 3) areas too degraded and/or small to represent an association (FERU-GRST-CALE map unit),
- 4) poorly classified vegetation (GAUSHA, PICO-PSME, PSME/RONU-QUGA-SYAL, ROCK OUTCROP, RONU-GASH, ROSNUT, RUBSPE, SYAL-RONU map units) or
- 5) disturbance vegetation (AGCA-FEAR, BRORIG, LOLPER, VUBR-BRRI map units).

Carter Point, Skagit County

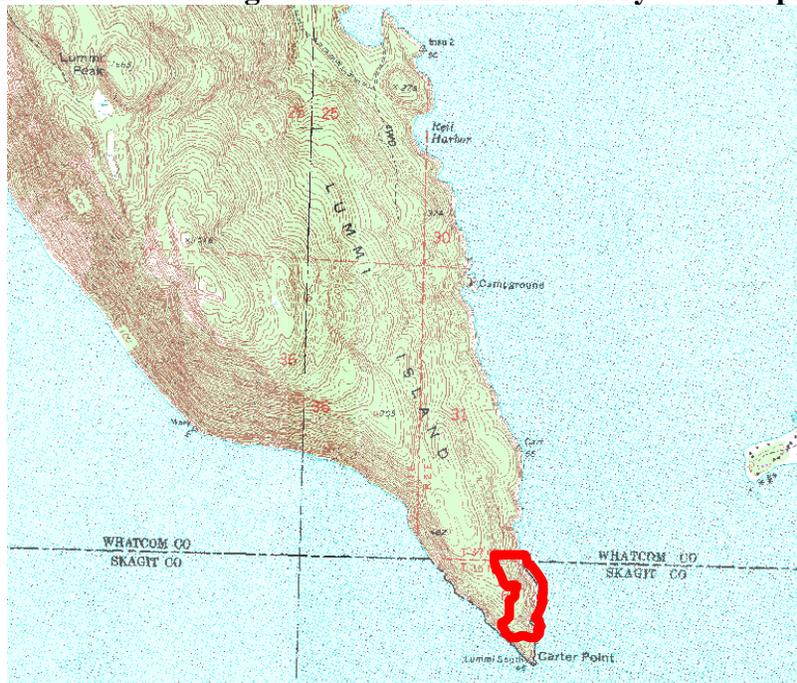
Carter Point is the south end of Lummi Island. The 2005 survey of Carter Point expanded upon 1999 Natural Heritage inventories of Lummi Island on land adjacent to and north of the BLM property. This portion of Lummi Island supports a large forested landscape with abundant mature natural-origin forest. The Washington Department of Natural Resources Lummi Island Natural Resources Conservation Area (NRCA) is less than one-half mile north of Carter Point. Several of the forest association occurrences appear on both BLM and NRCA areas. The current inventory supports management of both areas as conservation areas. Acquisition of private land between BLM and NRCA could improve management of shared forest types.

Management Comments: Experimentation with prescribed fire may be warranted, especially where fungal diseases are resulting in Pacific madrone decline (Elliott, M, R.L Edmonds and S. Mayer. 2002. Role of fungal diseases in decline of Pacific madrone. Northwest Science 76:44, 293-303). Monitoring of recreational use of the trail corridor and possible impacts is recommended. Of particular concern are the non-natives English ivy (*Hedera helix*) and herb Robert (*Geranium robertianum*). These are most likely in the more mesic forest types.

Four forest association occurrences appear on BLM property and extend on to adjacent land ownership:

Douglas-fir / Common Snowberry - Oceanspray (*Pseudotsuga menziesii* / *Symphoricarpos albus* - *Holodiscus discolor*) Forest association Global Rank: G1 State Rank: S1. This association has a small global range and very few good quality occurrences (four of seven known are on protected sites). Most poorer condition examples have been altered by past timber harvest or fragmentation. This Lummi Island occurrence is part of a large undeveloped, partially natural-origin, forest landscape. It borders an undeveloped shoreline to the east. It is a mature forest (about 125 years old) that has never been logged with scattered old residual trees. Evidence of fire prior to establishment of the mature cohort exists throughout the stand. Douglas-fir completely dominates the main canopy with some Rocky Mountain maple (*Acer glabrum*) in subcanopy. Dense tall shrubs dominate the understory. All of this 10 acre occurrence is on BLM land and appears on a steep east-facing slope, and to a lesser degree, on the moderate upper slope and ridgetop. This occurrence is found in mosaic with Douglas-fir – Pacific Madrone / Hairy Honeysuckle, Douglas-fir / Salal – Oceanspray and Douglas-fir - Western Redcedar / Salal – Oregongrape / swordfern associations.

CEGL000460 Douglas-fir / Common Snowberry - Oceanspray

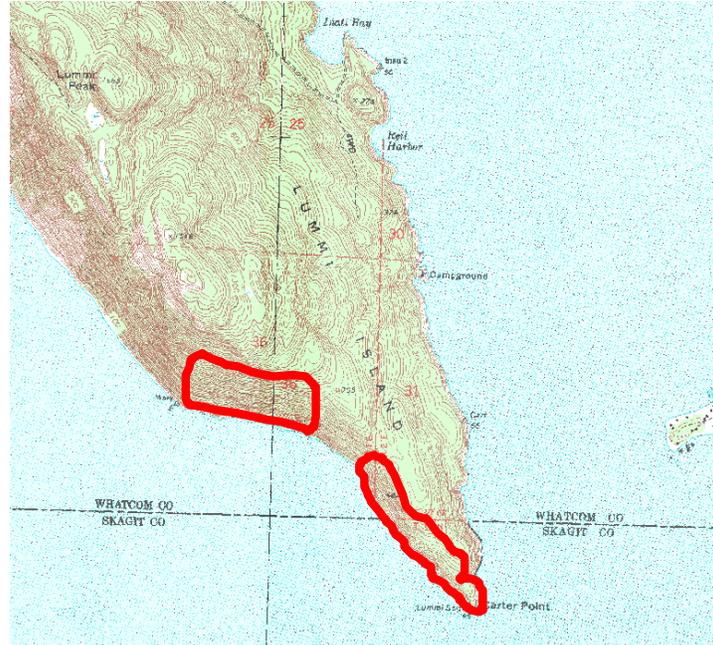


Douglas-fir – Pacific Madrone / American Vetch (*Pseudotsuga menziesii* - *Arbutus menziesii* / *Vicia americana* Forest association: Global Rank: G1G2Q State Rank: S1? (This is *Pseudotsuga menziesii* - *Arbutus menziesii* / *Holodiscus discolor* – *Lonicera hispidula* in the newer classification of Chappell 2006).

This association occurs primarily in the Olympic rain shadow with outliers in the southern Puget Lowland. No more than 25 relatively high quality occurrences are likely. Most of the 13 currently known examples are small, or degraded by development, logging, or non-native plant species. The southern Lummi Island occurrence is part of a large undeveloped, partially natural-origin area of mature forest dominated by Douglas-fir with some western redcedar. No roads or trails are located in or nearby this occurrence. No past logging activity is evident. It is a mature post-fire forest and woodland (125 year old estimated) with frequent old-growth residual Douglas-fir trees. The canopy is dominated by a mix of Douglas-fir and madrone. Significant portions of the area may have been savanna maintained by frequent fires (char on bark of old trees) prior to Euro-American settlement. The occurrence appears more diverse in the northern patch than the southern patch, which has more exotics. Over half of this 65 acre occurrence is located on BLM land on steep south to west-southwest aspect slopes near saltwater, and to a lesser degree on the moderate upper slope and ridgetop. Soils are shallow to bedrock with frequent small outcrops. It forms a mosaic on the upper slope and ridgetop with other an occurrence smaller Pacific madrone type (PSME-ARME/GASH map unit). Herbaceous balds and savanna habitat appear in this association along some portions of slope. Experimentation with prescribed fire may be warranted, especially where fungal diseases are resulting in Pacific madrone decline

(Elliott, 2002). The fruit of Pacific madrone is highly sought-after by birds in the fall and early winter and may represent a special management focus.

CEGL000422 Douglas-fir – Pacific Madrone / Hairy Honeysuckle



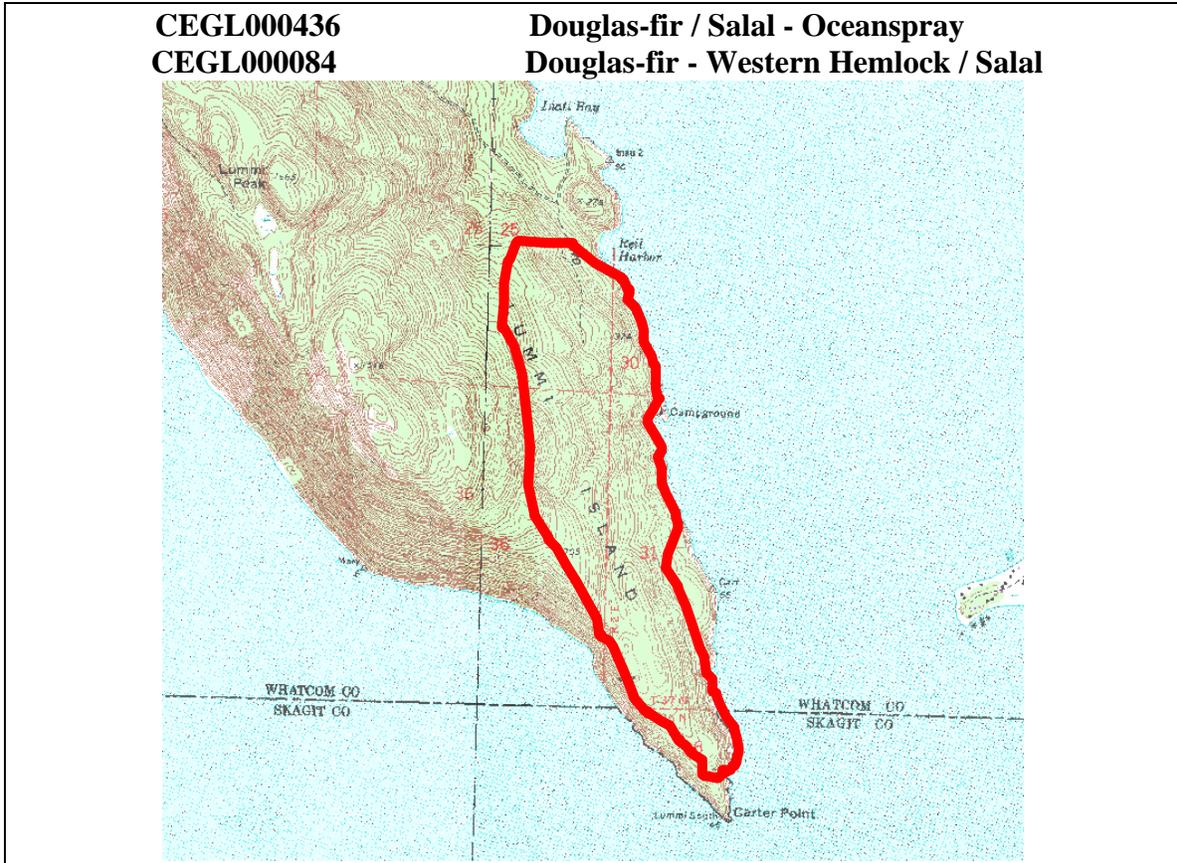
Douglas-fir / Salal - Oceanspray (*Pseudotsuga menziesii* / *Gaultheria shallon* - *Holodiscus discolor*) Forest association Global Rank: G2G3 State Rank: S2.

Few occurrences of relatively good quality remain; 17 are known in Washington. The occurrence on southwest Lummi Island is part of a large forested landscape with abundant mature natural-origin forest. The portion of this occurrence on BLM has never been logged. It is a multi-aged stand of mature (125 years) and young forests with scattered old residual trees. It is dominated by Douglas-fir with a few Pacific madrone trees. The 200 acre occurrence is located on steep rocky northeast to east facing slopes fronting undeveloped saltwater shoreline. It also appears on rounded ridgetops with gentle to moderate slope in a mosaic primarily with the Douglas-fir - Western Redcedar / Salal – Oregongrape / swordfern association. The WA DNR portion (most of the occurrence) has some selective logging along an abandoned road.

Douglas-fir -Western Hemlock / Salal (*Pseudotsuga menziesii* – *Tsuga heterophylla* / *Gaultheria shallon*) Forest association Global Rank: G3 State Rank: S2. (This is *Pseudotsuga menziesii* – *Thuja plicata* / *Gaultheria shallon* – *Mahonia nervosa* / *Polystichum munitum* in the newer classification of Chappell 2006).

This association has a very limited global range with only about five high-quality occurrences known in Washington, all of which are relatively small. Part of a large undeveloped forest landscape on Lummi Island, this occurrence is composed of both mature (125 years) and young forests with scattered old residual trees. The BLM portion

has never been logged. DNR portion has had some selective logging along an abandoned road paralleling the slope. Douglas-fir dominates or co-dominates the stand with western redcedar. Western hemlock is absent. Western redcedar is a major understory and subcanopy tree, though taller Rocky Mountain maple plants are locally abundant. This 130 acre occurrence appears on the northeast to east aspect of a steep slope fronting undeveloped shoreline, as well as on the broad rounded ridgetop. It extends north onto the NRCA and often occurs in a mosaic with Douglas-fir / Common Snowberry - Oceanspray.



Other map units that appear at Carter Point are grass or shrub dominated areas that are too small to be fully representative of an association (ROSNUT, SYAL-RONU, ARTSUK, BRHO-ALCE-BRTE, and FERU-GRST-CALE map units).

Lummi Rocks, Whatcom County

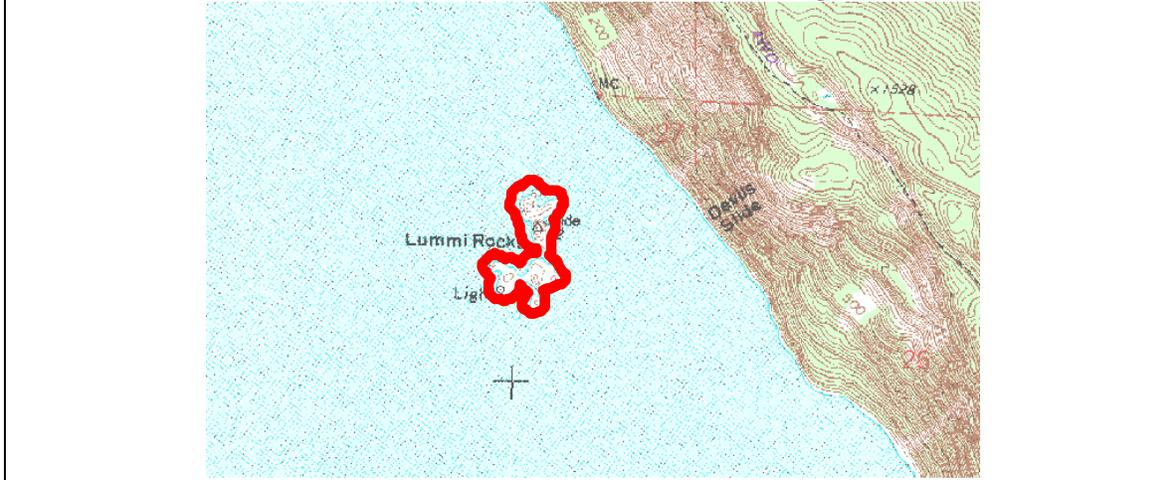
This is the first Natural Heritage inventory of Lummi Rocks. This cluster of small islands off the west shore of Lummi Island is undeveloped. Shallow soils subject to salt spray typify this cluster of islands. The islands are topography uneven, rounded, with gentle to moderate slopes although some slopes are steep. Overall species diversity is moderate. Shrubs are locally present in small amounts over most of the islands although they do form small, isolated shrub patches. Only a few small Douglas-fir sapling trees grow on these islands. The islands support grasslands and rocky sites in good condition. The most abundant grassland (discussed below) is found in similar or better condition at three other sites that receive some conservation focus. Management of Lummi Rocks for its habitat qualities would be appropriate for the site. Monitoring the site is recommended for changes in existing pasture grass abundance and for possible invasion of new exotic plant species.

One grassland occurrence appears on Lummi Rocks:

Red Fescue - Great Camas - Oregon Gumweed (*Festuca rubra* - *Camassia leichtlinii*, *Grindelia stricta* var. *stricta*) Herbaceous Vegetation Global Rank: G1 State Rank: S1

Nine occurrences of this grassland association are known in Washington with fair to good ecological integrity. This more historically extensive grassland association has been reduced by development, recreational impacts, and the invasion and increase of non-native species, native trees and shrubs resulting from fire suppression. The patchy, three acre grassland occurrence on Lummi Rocks occurs in a mosaic mostly with rock outcrops and, to a lesser degree, shrublands (map unit HODI-RONU), American dunegrass (*Leymus mollis*) community (map unit LEMO-LAJA) and Kinnikinnick – broadpetal strawberry – (Roemer’s fescue) (*Arctostaphylos uva-ursi* – *Fragaria virginiana* – (*Festuca roemeri*)) dwarf-shrubland (ACRUV map unit and see Chappell 2006). Good to fair condition patches of largely native grass dominate the community. Bare-stem lomatium (*Lomatium nudicaule*) is occasionally prominent (map unit LONU-GRST). Red fescue (*Festuca rubra* var. *littoralis*) is dominant or co-dominant consistently with several other herbaceous species (map unit FERU-AMCH). Although these other associations are too small to be tracked by NHP as occurrences, they add significantly to the biodiversity of Lummi Rocks. Exotic plants are represented only by isolated velvetgrass (*Holcus lanatus*) and soft brome (*Bromus hordeaceus*).

CEGL003347 Red Fescue - Great Camas - Oregon Gumweed



South end of Eliza Island, Skagit County

The Eliza Island tract was inventoried remotely. Most of the island appears to be developed supporting houses, lawns, airstrip, and roads. A Douglas-fir dominated forest blankets much of the island including the BLM tract on its most southern tip. The tract consists of steep forested headland slopes and a portion of the flatter top of the island. Extrapolating from similar environments on Carter Point on Lummi Island, this portion of Eliza Island likely supports modified occurrences of **Douglas-fir – Pacific Madrone / Hairy Honeysuckle** (*Pseudotsuga menziesii* - *Arbutus menziesii* / *Vicia americana* **forest association**: Global Rank: G1G2Q State Rank: S1? and **Douglas-fir / Common Snowberry - Oceanspray** (*Pseudotsuga menziesii* / *Symphoricarpos albus* - *Holodiscus discolor*) **Forest association**: Global Rank: G1 State Rank: S1. Both occurrences would be small and most likely be, at best, in fair condition judging from adjacent roading, apparent tree size, and likely presence of livestock and residential activities. No management recommendation can be made without a site visit to verify condition and possible rare species presence.

Rex C. Crawford, PhD
Natural Heritage ecologist
Washington Department of Natural Resources
2006

Appendix A:

Map unit labels and scientific and common names for inventory of BLM islands. Map units are described associations (**in bold**) or existing vegetation.

Island	Map Unit	Full name	Common name
Patos	AGCA-FEAR	<i>Agrostis capillaris</i> - <i>Festuca arundinacea</i>	colonial bent grass - tall fescue
Patos	ALRU/POMU	<i>Alnus rubra</i> / <i>Polystichium munitum</i>	red alder / swordfern
Lummi	ARCUVA	<i>Arctostaphylos uva-ursi</i>	kinnikinnick
Carter	ARTSUK	<i>Artemisia suksdorfii</i>	coastal wormwood
Carter	BRHO-ALCE-BRTE	<i>Bromus hordeaceus</i> - <i>Allium cernuum</i> - <i>Bromus tectorum</i>	soft brome-nodding onion-cheatgrass
Patos	BRORIG	<i>Bromus rigidus</i>	rip-gut brome
Lummi	FERU-AMCH	<i>Festuca rubra</i> - <i>Ambrosia chamissonis</i>	red fescue - silver burr ragweed
Patos Lummi		<i>Festuca rubra</i> - (<i>Camassia leichtlinii</i>, <i>Grindelia stricta</i> var. <i>stricta</i>)	red fescue - great camas - Oregon gumweed
Carter	FERU-GRST-CALE	<i>stricta</i>	gumweed
Patos	GAUSHA	<i>Gaultheria shallon</i>	salal
Lummi	HODI-RONU	<i>Holodiscus discolor</i> - <i>Rosa nutkana</i>	oceanspray - Nootka rose
Lummi	LEMO-LAJA	<i>Leymus mollis</i> - <i>Lathyrus japonicus</i>	American dunegrass- beach pea
Patos	LOLPER	<i>Lolium perenne</i>	perennial rye
Lummi	LONU-GRST	<i>Lomatium nudicaule</i> - <i>Grindelia stricta</i> var. <i>stricta</i>	bare-stem lomatium - Oregon gumweed
Patos	PICO-PSME	<i>Pinus contorta</i> - <i>Pseudotsuga menziesii</i>	lodgepole pine - Douglas-fir
Patos	PICO-PSME/GASH	<i>Pinus contorta</i> - <i>Pseudotsuga menziesii</i> / <i>Gaultheria shallon</i>	lodgepole pine - Douglas-fir / salal
Patos	POBA/COSE	<i>Populus balsamifera</i> ssp. <i>trichocarpa</i> / <i>Cornus sericea</i>	black cottonwood / red-osier dogwood
Patos	POBA/RUSP/POMU	<i>Populus balsamifera</i> ssp. <i>trichocarpa</i> / <i>Rubus spectabilis</i> / <i>Polystichium munitum</i>	black cottonwood /salmonberry/swordfern
Patos	PSME Savanna	<i>Pseudotsuga menziesii</i> savanna	Douglas-fir savanna
Patos Carter	PSME/GASH-HODI	<i>Pseudotsuga menziesii</i> / <i>Gaultheria shallon</i> - <i>Holodiscus discolor</i>	Douglas-fir / salal - oceanspray
Patos Carter	PSME/HODI-SYAL	<i>Pseudotsuga menziesii</i> / <i>Holodiscus discolor</i> - <i>Symphoricarpos albus</i>	Douglas-fir / oceanspray - common snowberry
Patos	PSME/RONU-QUGA-SYAL	<i>Pseudotsuga menziesii</i> / <i>Rosa nutkana</i> - <i>Quercus garryana</i>- <i>Symphoricarpos albus</i>	Douglas-fir / Nootka rose -Garry oak - common snowberry
Patos	PSME-ABGR/GASH	<i>Pseudotsuga menziesii</i> - <i>Abies grandis</i> / <i>Gaultheria shallon</i>	Douglas-fir - grand fir / salal
Patos	PSME-ABGR / HODI /POMU	<i>Pseudotsuga menziesii</i> - <i>Abies grandis</i> / <i>Holodiscus discolor</i> / <i>Polystichium munitum</i>	Douglas-fir - grand fir / oceanspray / swordfern
Patos Carter	PSME-ARME/GASH	<i>Pseudotsuga menziesii</i> - <i>Arbutus menziesii</i> / <i>Gaultheria shallon</i>	Douglas-fir - Pacific madrone / salal
Carter	PSME-ARME/ HODI/ LOHI	<i>Pseudotsuga menziesii</i> - <i>Arbutus menziesii</i> / <i>Holodiscus discolor</i> - <i>Lonicera hispidula</i>	Douglas-fir - Pacific madrone / oceanspray - hairy honeysuckle
Patos	PSME-THPL/GASH- MANE/POMU	<i>Pseudotsuga menziesii</i> - <i>Thuja plicata</i> / <i>Gaultheria shallon</i> - <i>Mahonia nervosa</i> / <i>Polystichium munitum</i>	Douglas-fir - western redcedar / salal - dwarf Oregongrape / sword fern
Patos	PSME-THPL/HODI-SYAL	<i>Pseudotsuga menziesii</i> - <i>Thuja plicata</i> / <i>Holodiscus discolor</i> - <i>Symphoricarpos albus</i>	Douglas-fir - western redcedar / oceanspray - common snowberry

Patos Carter	PSME- THPL/MANE- GASH/POMU	<i>Pseudotsuga menziesii</i> – <i>Thuja plicata</i> / <i>Mahonia nervosa</i> - <i>Gaultheria shallon</i> / <i>Polystichum munitum</i>	Douglas-fir – western redcedar / dwarf Oregongrape - salal / sword fern
Patos	PSME-THPL-ABGR/ GASH	<i>Pseudotsuga menziesii</i> - <i>Thuja plicata</i> - <i>Abies grandis</i> / <i>Gaultheria shallon</i>	Douglas-fir - western redcedar- grand fir / salal
Patos Lummi	ROCK OUTCROP		rock and barren
Patos	RONU-GASH	<i>Rosa nutkana</i> - <i>Gaultheria shallon</i>	Nootka rose
Patos Carter	ROSNUT	<i>Rosa nutkana</i>	Nootka rose - salal
Patos	RUBSPE	<i>Rubus spectabilis</i>	salmonberry
Patos	SALLUC	<i>Salix lucida</i>	Pacific willow
Patos Carter	SYAL-RONU	<i>Symphoricarpos albus</i> - <i>Rosa nutkana</i>	common snowberry - Nootka rose
Patos	THPL-ABGR/POMU	<i>Thuja plicata</i> - <i>Abies grandis</i> / <i>Polystichum munitum</i>	western redcedar - grand fir / sword fern
Patos	THPL-ACMA-ABGR / (OECE)/ POMU	<i>Thuja plicata</i> - <i>Acer macrophyllum</i> - <i>Abies grandis</i> / <i>(Oemleria cerasiformis)</i> - <i>Polystichum munitum</i>	western redcedar - bigleaf maple grand fir / (Indianplum) -sword fern
Patos	VUBR-BRRI	<i>Vulpia bromoides</i> - <i>Bromus rigidus</i>	six-weeks fescue - rip-gut brome



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Scoping Comment SJINM

To: [REDACTED] sanjuanislandsnm@blm.gov [REDACTED]

When we began looking for ways to protect the lands on South Lopez in the early 1990's we set out the following vision:

"It is our vision to preserve the land in it's present wild condition, as a habitat for the diverse natural population and as a place to wander the deer trails and feel the wonder of large unmanaged sections of land.

"It is also our vision that the forested parts of the lands be left in their present state so they can become, for future generations, true old growth forests.

"It is our intent that the public and private use of this land assure preservation of the unique qualities of this sensitive area. We do not seek to create a park for camping or vehicles, but rather a preserve which is used lightly and where honoring and respecting the land and its natural systems is our first concern."

Our new National Monument has grown well beyond our initial vision and the 450 acres on S. Lopez. It strikes me that the management of each piece of the National Monument needs to be considered individually and the last sentence of our initial vision statement may be a connecting thread.

"We do not seek to create a park for camping or vehicles, but rather a preserve which is used lightly and where honoring and respecting the land and its natural systems is our first concern."

In our increasingly busy world we need places to reconnect with the mystery and energy of the natural world. That is my hope for the National Monument. A place of quiet to listen, learn from and experience this wonderful place we call home.

Thank you for your consideration,

Warm regards,
[REDACTED]

San Juan Islands National Monument

Resource Management Plan

Scoping Comment Form

██████████, San Juan County resident

1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?).
2. What are some of the approaches to addressing these issues that the BLM should consider through the planning process?
3. What are other topics or concerns that you would like the BLM to address through the planning process?

Responses:

To # 1: One of the main management challenges for the BLM in its stewardship of the SJIs NM is the issue of noxious weeds. The future Resource Management plan for this monument should plainly state that the BLM will do its utmost to control or eradicate (depending on the state's classification) noxious weeds found on the various islands, rocks and pinnacles under BLM control. While this seems straightforward, it should be recognized that the method of control will vary depending on the circumstances of the site and the particular weed at hand. In the past, the BLM in San Juan County has been hesitant to use certain tools available in a typical "integrated vegetation management" (IVM) toolkit, such as the use of herbicides or fire. Even the removal of weeds by hand-pulling has been declined, under the assumption that these lands may have culturally significant artefacts that might be disturbed in the course of such land management activities.

The BLM has suggested, prior to weed management actions of this sort, that an archaeologist may need to be hired to evaluate an area for historical or archaeological significance, if any, before other work could proceed. If that is the condition that should be met beforehand, the BLM should have its lands fully evaluated by a competent archaeologist, posthaste. Noxious weeds do not wait for decisions to be made; any further delay will only add to their propagation and make control more expensive, while damaging fragile terrestrial ecosystems.

A second issue that must be addressed for the SJIs NM RMP is visitor access. Many people who come to the San Juan Islands (or already live here) are not well versed in proper outdoor etiquette and may, unwittingly or no, damage or threaten the resource. The staff of the BLM should continue to try to reach these visitors and educate them about appropriate use or "passive consumption". Most visitors will never view or set foot upon most of the lands under BLM control, but in those areas most heavily

trafficked, the BLM can either tailor its message of low-impact use to the particular site or provide a broader-brushed explanation of why it is important to conserve the resource. Locals may provide some input about how this might be done, but it should be remembered that this is a monument for all of the citizens of this country, not just the lucky few who happen to live here. In other words, the BLM staff may be sensitive to local needs up to a point, but it should not be “captured by its constituency”. If local visitor access is detrimental to the resource, the BLM must consider denying that access or modifying it in an appropriate way (volunteer trails on Indian Island come to mind). A “leave no trace” policy, as developed this spring with the help of BLM staff, may certainly be the guiding principle for the most sensitive sites.

Response to #2:

Since the great bulk of visitors to the San Juan Islands arrive via ferry, it would be a great opportunity for the BLM to provide information to passengers waiting at the Anacortes ferry terminal. With two or more hours spent in the parking lot, visitors have a lot of time to absorb any information the BLM wished to share, such as proper use of the new monument. A kiosk with information, or better yet, a staffed visitor center, as with national parks, could be located there. It might be the only contact that the BLM has with these visitors, so its potential value should not be underestimated. This approach would also allow the BLM to promote certain management tasks, such as noxious weed control, prescribed burning, etc. to members of the public, thereby gaining wider acceptance and enhancing the mandate of its resource management plan. Alternatively, the BLM could place kiosks at the ferry terminals for Lopez, Shaw, San Juan and Orcas, though by then, most peak-season ferry riders would be heading home, thus diluting the potential impact of the BLM’s message.

Response to #3:

I would like to see the BLM, along with other agencies and nonprofit groups, try to come to grips with the use or misuse of our marine resources, both within the monument’s waters and beyond. Overfishing is one obvious example, which can potentially threaten the orca population. Another big one is waste disposal. Our beaches seem to have far too much refuse to be explained away by local sources. I suspect that larger players, perhaps international in origin, are responsible for at least some of the trash that washes ashore (think illegal dumping of garbage). More research into this problem might yield helpful ways to stanch the flow of human waste into monument waters, which can injure or kill fish, marine mammals and birds.



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

SJI Monument scoping suggestions from a Lopezian viewpoint

Mon, Mar 23, 2015 at 9:55 AM

To: [REDACTED]
blm_or_sanjuanislandsnm@blm.gov

Greetings,

First, thanks for all that you (staff and volunteers) are doing to protect the San Juan Islands. As a resident of Lopez Island I am extremely interested in the responsible stewardship of this beautiful and fragile environment.

At times I am worried that the monument's designation could prove deleterious to this purpose. As a recreational guide living in a town near the recently designated Browns Canyon National Monument told reporters: "From a business aspect it looks really, really good. Whenever a national monument comes up, the increase in visitors is always there," said Mike Whittington, owner of Independent White Water, which is based outside of Salida.

I know this phenomenon first-hand. For 10 years my family and I lived in the Florida Keys- a fragile string of barrier islands, back-country mangrove flats, and coral reefs. During my time there I wrote a guide to kayaking the archipelago and served as a member of the Florida Keys National Marine Sanctuary Advisory Committee. Our community faced many of the same challenges that the San Juan Islands now must deal with. I think that despite our best efforts, much of the Keys' natural beauty and environmental richness has been lost due to pressures from the tourist industry. It has been "loved to death" or near-death (coral reefs covered in algae from sewage run-off; fish populations decimated from over-fishing, etc.). Many people are attracted to "out of the way places" like the Keys and the San Juans, but they bring a consciousness rooted in suburban and urban America and they seem to come all at once, in numbers that are out of scale with the landscape. Safe-guarding the SJI Monument from this threat will be challenging.

So I urge you to keep this challenge foremost in your minds as you formulate plans for protecting the SJI national monument. We islanders have informally, individually and collectively safeguarded this environment for generations. Now we need to make sure that visitors and new island residents continue this important tradition.

I'm sure that you will receive many useful suggestions during your scoping process. I'd like to offer three myself.

The first is based on an experience that is becoming more and more common for me when I go to Shark Reef, Pt. Colville, and Iceberg Point. As I walk quietly or sit watching the vistas and wildlife I often am jarred by the sound of tour guides' spiels amplified by speakers on boats passing through the nearshore waters surrounding these places. Because sound travels so easily across water this sound is further amplified. It is an abrasive, unwelcome, unsolicited intrusion into an otherwise tranquil

environment. It prevents the mentally and spiritually restorative experience that people seek in natural settings. President Obama's proclamation creating the SJI National Monument specifically noted that no motorized vehicles could be used for non-emergency purposes. I think that this prohibition was a very wise method of ensuring low decibel levels. **I hope that you will find a way to prohibit the use of amplified speakers on boats or any other tourist "activities" or in the monument.**

My second suggestion is based on my experience at Shark Reef and Iceberg Point, where old informal trails appear to have been widened (either to accommodate visitors or clear brush). This is especially sad to see in areas where salal grows alongside the trail. Adults (but especially children) love the experience of parting the vegetation as we walk, feeling as if we are discovering a secret passageway to a hidden vista. When the trails are wide they become more like a highway, and we lose that special quality that remote islands like the San Juans preserve. Slowing down and encouraging a sense of wonder helps both us and the landscape. **I hope that you will find a way to limit all trails in the monument to single file width.**

Finally, I'd like to suggest that you limit San Juan Transit and other buses or tour operators (including bike tour vans) to one, clearly specified, limited time of day. This suggestion is based on the ever-increasing summertime phenomenon of buses disgorging 20 or more people at Agate Beach or the Iceberg Point Trailhead. As an islander I value quiet contemplation with nature. If I know when large groups of tourists are going to visit monument lands I will choose to come at another time. I also think that although tour groups are supposed to pay an impact fee, doing so doesn't mean that they are entitled to block the road or trailheads for long periods of time. I have encountered several of the bike tour companies taking up the entire Agate Beach parking area and roadway for many hours at a time as they set up tables with food and drinks for their customers.

I hope that this doesn't sound too plaintive or shrill. I have strong opinions because I have cherished this land and seascape for many years and made it my home. I also know first-hand that national monuments, national seashores, and other nationally designated natural areas have become extremely popular and profitable destinations for tour companies. I don't want to see SJI become a "tourist attraction". Tourists are welcome, but the main objective of designating a national monument is protection, not profit generation. Now that the monument is a reality I feel that my perspective on "before" and "after" may prove helpful in your scoping process.

Thank you for helping us to protect this awe-inspiring environment!

[REDACTED]



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Scoping Comments for SJNM

Mon, Mar 23, 2015 at 8:27 AM

To: "blm_or_sanjuanislandsnm@blm.gov" <blm_or_sanjuanislandsnm@blm.gov>

Thank you for inviting this input. My husband and I live opposite the entrance to Iceberg Point; in fact, Iceberg Point IS the reason we moved there. I walk and run there every day, sometimes twice a day; I call it "my big beautiful backyard." So you can certainly imagine I have some opinions as to its usage. Here they are:

1. "What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan?"

- A) Land and wildlife preservation
- B) Family-friendly tourist appeal

2. "What are some approaches to addressing these issues that that the BLM should consider through the planning process?"

BLM should consider banning all hunting on the Monument. The anxiety created for all non-hunting visitors to the Monument during hunting season makes all of us think twice about even going out there. I have witnessed hunters carrying a dead doe past a horrified-looking family with young children. I have discovered a pile of guts left by hunters just off the path near the monument hill. Hunting simply does not match the mandate of what is now, to all intents and purposes, a park.

3. "What are other topics or concerns that you would like the BLM to address through the planning process?"

A) DOGS. I would like to see the question of dogs on leash addressed with more stringency. Tourists are less a problem here than locals; I know Lopezians who flat-out refuse to leash their dogs even when asked politely. Somehow it needs to be impressed on Lopezians that if we don't leash our dogs, we cannot expect to ask tourists to leash theirs. Protecting ground-nesting birds and wildflowers, protecting people who might fear dogs, protecting leashed dogs from those out of control: these are all good reasons. More signs and maybe even a "mutt-mitt" station with poop bags would reinforce the message: this is a wild area, not a dog run.

B) BIKES. I would like to see the bike rack returned to the entrance, along with a no-bikes sign. In my experience, very few people violate this rule when the rack is made available to them.

C) PARKING. We are constantly having to discourage people from parking along the side of Flint Rd. near the entrance. We would like to see that shoulder blocked off with logs and marked with No Parking signs. At the same time, parking down below near the mailboxes, or at Agate Beach, may need to be expanded.

D) SIGNAGE. Along with no-bike and leash-your-dog signs, Iceberg Point REALLY NEEDS directional signage. Despite the homemade signs my neighbors and I have posted, trying to direct newcomers to the entrance, we end up redirecting easily a dozen lost people or groups every day during the summer months, to keep them from wandering down our neighbors' driveway.

Thanks once again for inviting our participation.

[REDACTED]

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San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

RECEIVED
MAR 24 2015
BY:

BLM

The Bureau of Land Management (BLM) Spokane District is seeking early public input, through a process known as scoping, as it begins preparing a Resource Management Plan (RMP) for the San Juan Islands National Monument. The RMP will provide the goals, objectives, and direction that will guide the BLM's management of the National Monument for the next 15 to 20 years. The BLM defines scoping as a collaborative public involvement process to identify planning issues to be addressed through the plan. For your comment to be reflected in the scoping report, and to be the most helpful for identifying issues to be addressed during the planning effort, please ensure that your scoping comments are submitted or postmarked by **April 1, 2015**.

The BLM wants to hear from you! The following questions have been provided to help you provide the most useful comments to the BLM but all comments are welcome. Please feel free to attach additional sheets of paper if your comments do not fit below.

1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

Public access and outreach via E mail
WEBSITE.

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

Publications and onsite instructions
about vegetation and wildlife protocols

3. What are other topics or concerns that you would like the BLM to address through the planning process?

MAR 24 2015
BY:



4. Other thoughts or suggestions?

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Name: _____

Mailing Address: _____

Email Address: _____

Please indicate your affiliation by checking **one** of the following boxes:

- Individual (no affiliation)
 Private Organization
 Citizen's Group
 Elected Representative
 Tribal, Federal, State, or Local Government

Name of organization, government, group, or agency (if applicable) DEER HARBOR COMMUNITY CLUB
 Comments may be submitted via the following methods:

Email: blm_or_sanjuanislandsnm@blm.gov

Mail: San Juan Islands National Monument RMP, P.O. Box 3, Lopez, WA 98261

Hand delivery: At a public meeting or BLM Lopez Island Office, 37 Washburn Place, Lopez Island, WA 98261

Fax: 503-808-6333



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MAR 24 2015

BY:

San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

.....BY:
MAR 24 2015
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BLM

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Submit by APR. 1, '15

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PROTECTION FROM DEVELOPMENT (Transmitters, Receivers, Tech → WI-FI systems, Direct & Indirect Wireless Syst. Sensors)
How will the BLM address the growing wireless bio-hazards that are disastrously affecting Birds (see Albert Marville, FWS research) & other pollinators, habitat within NAT. Mon. STI? Recommend protecting of our wildlife & habitat with meetings with the County Council & Land Use Board & District Energy Rep., Jeff Morris to review through NEPA-ESA standards the existing WI structures; Also to apply most stringent NEPA-ESA on future WI struct. permitting in San Juan Co.

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

See Albert Marville's research fr. FWS on Birds & Pollinator Death - To protect from Development these BLM's Nat. Mon. lands - esp. Wireless Tech. emissions/effects. Wildlife & habitat are our resources & to ultimately protect from long-lasting mutagenic, injurious effects of civilization - non-ionizing & ionizing radiation - esp. from microwave, radio wave stations. The growing wireless tech. grid is over-laying & distorting the Earth's natural grid & migration routes. Protect the 400 mile-wide flyway fr. Pole to Pole by limiting WI structures/systems.

3. What are other topics or concerns that you would like the BLM to address through the planning process?

The development of a county's district liaison officer/group to advise on ST County needs. Recommend any county council member & perhaps Howard Rosenbaum - County Land Use Council & again, Jeff Morris, 40th Congressional Dist. Rep.; And the development of a FWS rep. to guide BLM about the areas special needs - esp. WI transmitters.
Thank you.
Doroth Danner



4. Other thoughts or suggestions?

*Sensors,
Repeaters, Meters, transmitters,
Diedos? NT*

*Protect (limit) these BLM-Nat. Mon. areas fr. Surveillance gear
that emit harmful resonances to creatures, trees, habitat,
nesting trees & grounds.*

*Who is the over-seeing group for the SJI Nat. Mon. beyond BLM lands?
Is it FWS? Please let me know. Thank you.*

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- Elected Representative
- Tribal, Federal, State, or Local Government

Name of organization, government, group, or agency (if applicable) _____

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San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

BY:

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1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

I feel the ecological value of each site should be the primary focus of any plan, with recreational uses being the least important.

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

Restricting access to sites such as Indian Island when the Oyster Catchers are nesting.

3. What are other topics or concerns that you would like the BLM to address through the planning process?

Currently there are a number of parcels of land in San Juan County that are protected by various entities such as the Nature Conservancy + Land Bank. I am concerned that shifting fortunes + goals may eventually cause these parcels to end up on the market. I would like to see the planning process consider ways to add additional parcels to the monument in the future.



4. Other thoughts or suggestions?

[Empty text box for comments]

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Name
Mail
Ema [Redacted contact information]

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Name of organization, government, group, or agency (if applicable) _____

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MAR 24 2015

BY:.....

Ms Marcia de Chadenedes
S J I National Monument Mngr

Re: 8160/1610 (ORW000)

I see the three most critical issues ecologically for the RMP to consider are; Protection of the resident Orca Pods, the near shore marine life, and the Garry Oak ecosystem,

Although the Whale Watch industry has focus^{ed} great public attention to their plight, I think the expansion of this activity is a stressful factor. I suggest there should be expanded "no go" zones. Additionally, Whale Watch activity should be banned^{on} certain days out of the week.

Near shore marine life has been damaged by what I consider to be poorly regulated and unenforced harvesting of Sea Cucumbers and Urchins . Since I started monitoring the shoreline near Sea Acres on Orcas Island in 1981, these two creatures have virtually been eradicated, Additionally, there was a population of native Abalone until harvesting of the above began.

The Garry Oak ecosystem is very threatened, and where it has a chance at recovery, it would rebound with removal of overtopping conifers. For instance, there are several hundred Oaks on Jones Island, many of which are dying. About 15 to 20 years ago the then Manager of Local State ^{PARKS} ~~Parks~~ undertook a program to remove Douglas Firs and the Oaks flourish^d for some years. Also, there is a good population of the Native Prickley Pear Cactus on Jones Island that now suffers from human traffic. Better trail signage and replanting broken off pieces would help.



San Juan Islands National Monument
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MAR 25 2015

BY: TPLPS meeting

The Bureau of Land Management (BLM) Spokane District is seeking early public input, through a process known as scoping, as it begins preparing a Resource Management Plan (RMP) for the San Juan Islands National Monument. The RMP will provide the goals, objectives, and direction that will guide the BLM's management of the National Monument for the next 15 to 20 years. The BLM defines scoping as a collaborative public involvement process to identify planning issues to be addressed through the plan. For your comment to be reflected in the scoping report, and to be the most helpful for identifying issues to be addressed during the planning effort, please ensure that your scoping comments are submitted or postmarked by **April 1, 2015**.

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Please insert that all "Hazmat" problems (asbestos, lead paint, etc.) will be corrected and not included in the RMP.

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

3. What are other topics or concerns that you would like the BLM to address through the planning process?



4. Other thoughts or suggestions? *At the RMP meeting in Anacortes, the BLM speakers should not use the word "I will do this etc." This denotes a person's ego needs, ~~and~~ ~~is~~ included in the speaker comments. The BLM employee's work as a team is "we"; as all phases of ~~any~~ project include numerous employees working as a team towards the completion of the work assignments.*

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Name of organization, government, group, or agency (if applicable)

Turn Point Lighthouse Preservation Society

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San Juan Islands National Monument
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MAR 25 2015

BY: *Office*

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The BLM wants to hear from you! The following questions have been provided to help you provide the most useful comments to the BLM but all comments are welcome. Please feel free to attach additional sheets of paper if your comments do not fit below.

1. One issue I am personally impacted by each summer is public invasion of private lands. On Little Mac, this is an issue for two reasons: Firstly, at low tide it is possible to walk from Little Mac across to the north end of McConnell, which is all privately owned. People are curious and do not respect private property signage. Secondly, there was an error in a public brochure that stated that all of McConnell was public land. It is not. People claim that they read it somewhere that it is okay to camp, poop, and explore all of McConnell! Another issue I have personally dealt with on Little Mac is that it is a heavily used latrine stop for kayakers, without benefit of latrine!! The BLM rule to limit this activity to areas at least 100 feet from water renders all of Little Mac ineligible, it is smaller than that!
2. A. Signage placed at kayak landing sites and trail heads, showing boundaries of public access, species on the site that need protection from public disturbance, and listing rules for behavior (similar to your handout card for kids) and listing the consequences of degradation. Some sites may qualify for designation as a no-trespass zone, for the sake of vegetation and animal species.

B. For each site: Create a monitoring and reporting system that will respond quickly to protection issues. Identify, contact and train as monitors those who, especially in the high season, feel a sense of ownership for the site and either see it from their home or visit it frequently. They could help you establish a baseline and a monitor sheet tailored to that site's special needs. Oftentimes summer people are good candidates for this, alongside year round monitors, because it is in the high season that closer monitoring is called for. A prime example of candidates to be monitors of Little Mac, are the various family members who for generations have spent time on and cared for McConnell. I have walked with them and know that they also monitor and care for Little Mac. They and I have picked up litter, repaired disturbed vegetation, and carefully removed toilet paper and feces. Who better to walk Little Mac with monitor sheet in hand? They already know it by heart.



4. Other thoughts or suggestions?

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There are two major areas of concern (issues to be dealt with) for me.

- I. How do we retain the wildness of currently unvisited offshore islands and rocks?
- II. How do we minimize adverse private-public interactions along National Monument boundaries?

I. I am concerned that the formation of the National Monument itself and publication of maps will attract more human visitors to areas previously left in a natural state, interfering with the stated purpose of the National Monument which is to preserve and protect.

In particular, the “**unsurveyed offshore islands and rocks**” are vulnerable.

Please do not assume that all areas categorized this way are the same. For example, some have been heavily used by people for years, and some are hardly touched. Some are practically covered at high tide, and some have managed to accumulate a layer of soil. Some are homes to seals, sea birds, otters and ground- nesting birds, and some are stripped bare. Some are clearly separate from the surrounding shoreline, and some are directly adjacent to private shoreline. Some are nearer to other National Management properties, and some are more isolated. The resources and situation of each individual area needs to be considered when creating a management plan.

In my strong opinion, a number of these small rocks and islands need to be closed to human use.

There are 4 reasons for this:

1. They are basically not usable for anything other than wildlife refuges.

2. They are fragile. They are small, and therefore less resilient to disturbance than larger areas. Any soil layer is very thin and easily eroded by foot traffic. The wildlife on them is very sensitive to human presence. The fescue grass on the island off our place would not stand up to foot traffic. This island off our place used to have oystercatcher nests every year, until someone visited several years in a row to show his child the eggs. It does not take much to lead to loss of natural resources like this. Our family is so concerned about this island that we ourselves do not visit there even though we can wade to it at low tide.

3. They are real refuges. There are few places in the San Juans where wildlife and plants are secure from people, dogs, cats, and foxes. I have personally seen deer try to escape dogs by swimming to the island off our place. Just this January, two dogs chased down and killed a deer off our shore. I am less concerned about deer than other animals such as shorebirds, but this was a striking example of the need for refuges.

The National Monument will need to balance the desire for public access with the need to provide wildlife secure areas to reproduce and live their lives. Just setting nest areas aside during the nesting season is not sufficient. For example, seal pups need secure areas during the risky time after their mothers leave them in late summer. Harlequin ducks need places to overwinter. If such areas are not provided, much of the diversity of inspirational natural assets that the National Monument was set up to preserve will be lost.

4. They are difficult to monitor and manage. There will not be enough staff to visit all these rocks and islands regularly. When problems are brought to the attention of BLM staff, there will be a significant amount of time before staff can respond. The particular visitors causing the problem will be long gone. Observers will not even have the ability to cite a license plate as would be the case in an area

on shore. There would be no sanitation facilities or garbage collection. The San Juans are very dry in the summer. I would worry about fire hazards in cases where rocks or islands are near shore.

II. My second major area of concern is how to avoid adverse unpleasant public - private interactions.

1. There are areas, where the boundary is difficult to mark because it goes through the rocky intertidal. The area is underwater much of the time and subject to violent storms. The line is not straight, but zigzags back and forth between rocks. When you are down in our coves it would not be not clear which of the sides of the coves a member of the public would be permitted to climb on and which sides they would not. (Please see accompanying photos.)

2. There are areas, where in order to access the National Monument land, private intertidal areas would have to be used by the public, either by walking along our shoreline, or by beaching their boats on privately-owned beaches. As the descendants of pioneering marine biologists who retired there, we treasure our intertidal ecosystem, especially the rare Epiactus sp. sea anemone. We have heard nearby untouched shorelines described by one visiting marine biologist as having “the best tidepools (he) had ever seen”. Even though it may look just like a bare bunch of rocks and seaweed, much of San Juan County’s intertidal area was once highly diverse, and in many places has been degraded by overuse. The ecosystem degraded by visiting public could include privately owned intertidal areas, in addition to the National Monument land.

In another Washington county, the local sheriff is unwilling to enforce no-trespassing requests of private landowners, because he is unsure of where exactly the low tide boundary line is. Private tideland owners have basically had to give up their tidelands.

In our particular situation, we have in the past had problems with people driving down our driveway to our house try to get to the water, as often as a couple of times a week. Seeing these rocks and islands on a map as directly at the end of our driveway and marked as open to the public and would likely encourage even more people to do this. There is already a “No shore access” sign.

3. There are areas, where the National Monument land and private property are so close together that it would be a huge burden on the property owner to have the public regularly occupying what feels like their private yard. It would take away the private landowner’s sense of refuge and being in their own home. It would take away land-owners’ opportunities to view the wildlife which would be scared away by the public. It would take away the inspirational aspect of the area for the private landowner. Some landowners would feel an obligation to take on the role of monitors and supervisors of the public. They would often be the ones picking up the litter.

4. There are areas, where visitors would be tempted to use adjacent private property in addition to the adjacent National Monument land. Little private pocket coves would be tempting places for picnics or secluded places to urinate. Clambering on clay cliffs would accelerate erosion.

Given all these issues, we would urge the planning team to classify the particular small island and rocks off our place, and any others that remain relatively untouched, as **closed to the public**. We would continue to stay off those rocks ourselves as we have in the past. This would satisfy the need to protect and preserve the natural resources there, and would vastly simplify any public-private discussions over appropriate use. The public is welcome to enjoy the area by boat, and view the seals, eagles, otters, northern rough-winged swallows, kingfishers and harlequin ducks that they see in the area above the water, as well as the beautiful sea anemones, sea cucumbers, sea urchins and sea stars that they can see

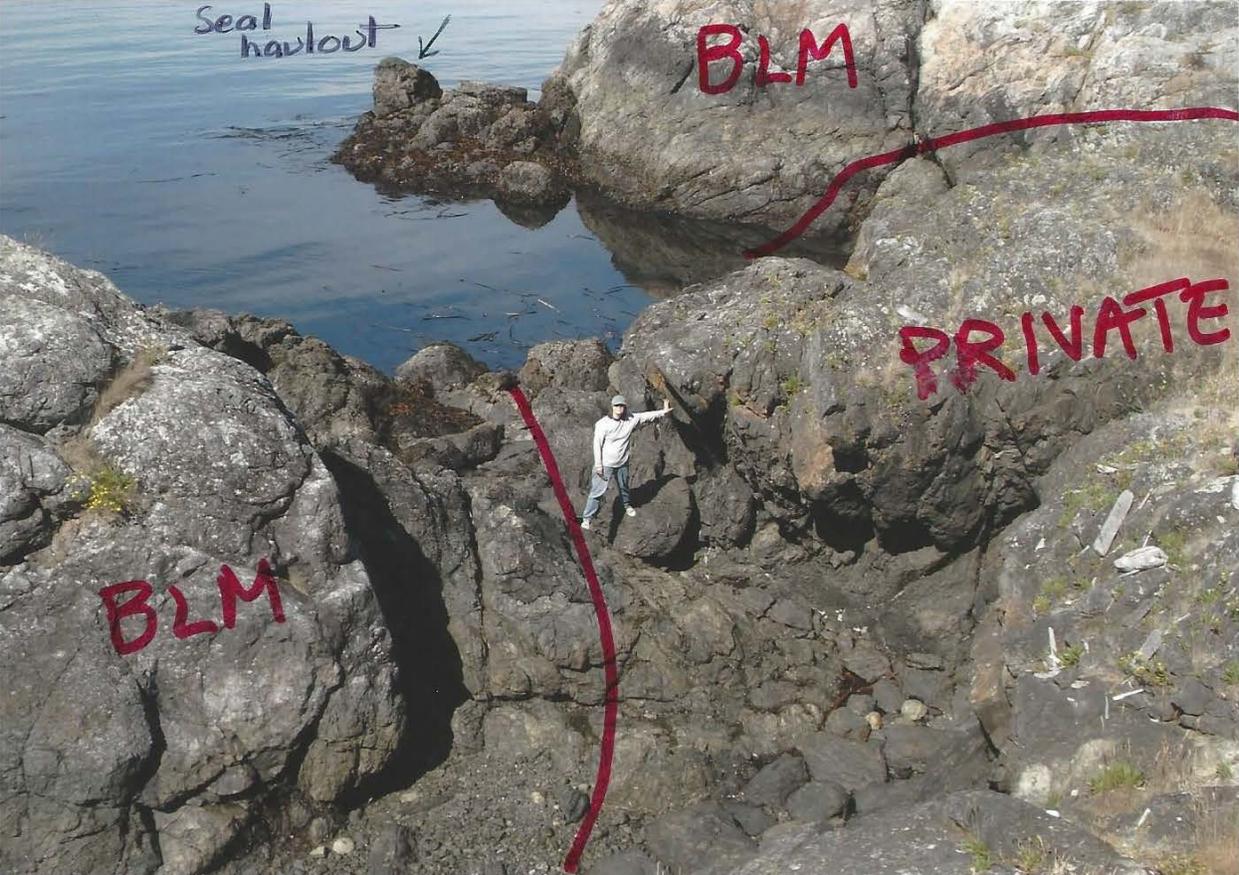
below the surface. Closing the rocks and island to foot traffic will help preserve those resources so that they can continue to inspire visitors in the future.

Please see 3 attached photos:

- one showing the proximity of the National Monument monitoring site 13-89 to a private residence,
- one showing the complex interfingering of private shoreline and National Monument rocks, and
- one showing the proximity of one National Monument rock to private shoreline and the difficult terrain for posting signs.

Sincerely,

[Redacted signature]



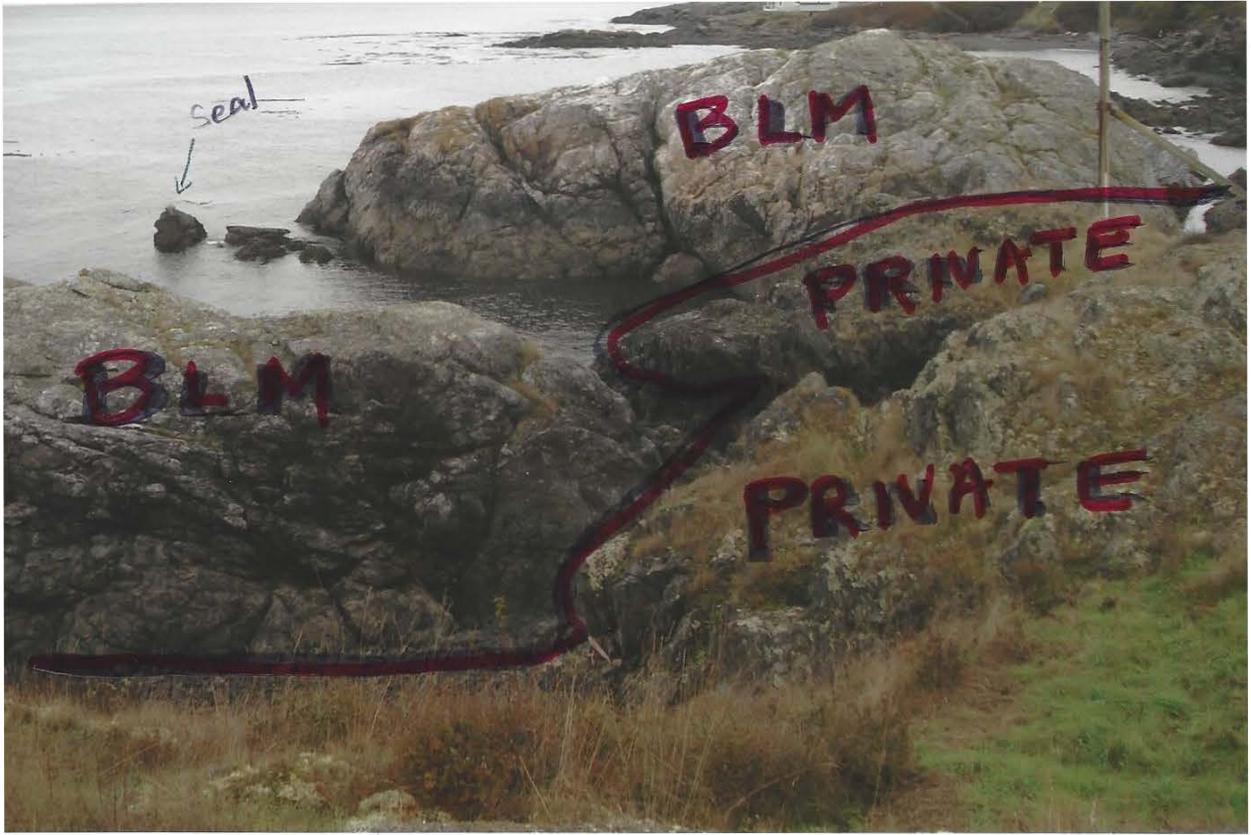
Seal haulout ✓

BLM

PRIVATE

BLM







SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

San Juan Island scoping comments

Fri, Mar 27, 2015 at 4:35 PM

To: blm or sanjuanislandsnm <blm_or_sanjuanislandsnm@blm.gov>

Marcia deChadenedes
Manager of the San Juan Islands National Monument

First I would like to thank you for the opportunity to make an initial input in the planning stage of this monument.

I do have a couple of concerns regarding this and future monuments.

1. The management of this area of islands, rocks, water, etc. will take a certain amount of resources in terms of people, money, and time to protect the beauty of this area. And the end result is to limit the use of the area to a small group of people (younger in age/physical ability) and those who can use the existing roads/trails. The people that currently have boats and other water craft are using and will continue to enjoy the water and beaches without having new rules/regulations.

2. The process in managing a monument that has private business and homes included in the monument area, in my mind, creates additional issues such as the improvement of the private ownership could/would be limited as well as the taxes to provide necessary services to those same people.

3. The management of this monument should be less restrictive and more people friendly so that it can be enjoyed by the greatest amount of people and educational personnel. The more restrictive the rules/regulations become, the fewer types of people will be able visit and enjoy (it becomes a

private parks for those the few) the monument. The people that use the water already have a number of rules/regulations that control the use/misuse for boating and that includes a large percent of the area in this monument.

Again I would like to thank you for the opportunity to comment. I am in favor of having less restriction so more people can enjoy this and other beautiful area and if needed, build in ways to control any activity that will destroy its beauty.

I am 77 years old and a lung cancer survivor and I enjoy getting out and seeing our beautiful state of Washington as much as is possible.



March 28, 2015

San Juan Islands National Monument RMP
PO Box 3
Lopez, WA 98261
blm_or_sanjuanislandsnm@blm.gov

Dear BLM,

Thank you for the opportunity to provide comments on issues that should be addressed in the planning process for the resource management plan (RMP) for the San Juan Islands National Monument.

I would like to strongly encourage the BLM to consider the following issues through the RMP development effort:

- The proclamation announcing the formation of the National Monument states that the purpose of the National Monument is to preserve, protect and restore. The rocks off my family's property are an important habitat for harbor seals, oyster catchers, fragile plants, rare grasses, and other flora and fauna. Visitors would scare off seals and other animals, leaving them without that refuge. The rocks also have very little soil, which would wear away quickly with any foot traffic. We do not go on those rocks ourselves, because we are concerned about the fragile ecology, and it would be a shame for that to be destroyed in less than one season by visitors who have no knowledge or concern for that delicate ecological balance.
- There are no BLM staff on site to monitor and supervise public use of offshore rocks. This means that it will become a major burden on private landowners with neighboring property to monitor use, inform users of boundaries (there are areas where people would be tempted to make use of adjacent private property, but we can't put up signs on land that is covered by water half the time, and subject to very strong storms), and try to report violations to the BLM. If there are violations (trespassing onto private land, building campfires, etc.), those responsible will be long gone by the time the BLM can send someone out to address the problem, and we will have no way of identifying who it was, so there will be little to deter future violations.

I believe the BLM should adopt the following strategies in its management of the San Juan Islands National Monument:

- Clearly indicate on the map that offshore rocks that are still relatively untouched are off-limits to visitors / foot traffic.
- Set up a color-code system on the map that clarifies which areas are ok for recreational use, and which areas are off-limits because they have not been used in that way to date and provide important refuges for vulnerable species. Communicate the rationale, and the consequences of non-compliance.
- Consider the difficulties of deterring and reporting violations of proper use, and enforcing any kind of sanction.

Thank you for your consideration. It is wonderful that we have this new National Monument, but if it is not managed effectively, it could end up doing a lot of harm. I hope that the RMP will be able to effectively secure the preservation and restoration of National Monument lands in the San Juan Islands, for many generations to come.

Sincerely,

██████████
██



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Scoping Statements for National Monuments on Lopez Island

Sun, Mar 29, 2015 at 10:38 PM

To: [REDACTED]
To: blm_or_sanjuanislandsnm@blm.gov

Thank you for your outreach to the community for suggestions about issues the BLM should consider adopting in its management of the San Juan Islands National Monument. Below are my thoughts:

- In general, I would like to see the National Monuments on Lopez Island be kept as similar as possible to how they are today. We live in a rural area of great natural beauty, and as such the lands should retain this character. Keep signage minimal and low impact, and do not "park the lands out." Keep them looking natural as they do today.
- With the increased usage by the public, please consider closing the National Monument lands year round for hunting. I fear that otherwise there may be casualties, and it takes away from the tranquility when walking the trail if one is fearful of potential bullets crossing the trail, (which I understand has occurred over the past few years).
- Please consider allowing quiet access around the clock to the trails. Many locals enjoy moonlight and/or pre-dawn meditative walks, and I understand that currently there is a dawn to dusk rule for trail walking.
- Please consider a plan for managing invasive plants that when necessary, addresses strategies to reduce invasive encroachments caused by neighboring properties.
- Please consider restrictions on noise, including limitations on the air noise caused by the Whidbey Island Naval base, so that the lands can be enjoyed without the deafening noise of the Growlers.

Thank you for your consideration of these ideas and the work you are doing to preserve these lands for future generations.

Sincerely,

[REDACTED]



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Scoping comments

Sun, Mar 29, 2015 at 10:17 PM

To: blm_or_sanjuanislandsnm@blm.gov

Lauren et al. My apologies for putting this off. It's not from lack of interest:

1. Given the intent to manage from an ecosystem-oriented perspective, the BLM plan should include nearshore and marine protection. One desirable outcome would be the establishment of marine protected areas adjacent to BLM lands, such as Watmough Bight. The goal would be non-consumptive use of resources and would include a ban on harvest of plants and animals, including fishes (i.e., a true, no-take preserve). This can be accomplished by engaging cooperating local, state, and federal agencies and tribes.

2. It is clear that hunting is incompatible with the vast majority use and users of Monument lands, endangering regular and occasional visitors. A ban on hunting would impact a very small group of part-time users and greatly increase the enjoyment and welfare of the main population of visitors. BLM should work with the appropriate agencies and tribes to create such a ban.

3. As expressed at the scoping meetings, many people derive a great deal of spiritual enrichment by visiting Monument lands. The vision statement as it now stands fails to reflect this important value, ending in ". . . rich in natural, cultural, and historical components." The vision statement should be changed to reflect the Monument's strong spiritual values by inserting the word "spiritual" into the statement: ". . . rich in natural, cultural, spiritual, and historical components." Nothing of a secular nature is necessarily implied by such an addition.

4. The many paths that wind through Monument lands are subject to erosion from the extensive foot use they receive. Minimizing erosion is one reason why bicycles are not permitted on these paths. The same restriction should apply to horseback riding, which causes even more severe damage, especially when trails are wet, as pertains to much of the year. Very few persons would be affected by such a restriction. In addition, the Management Plan should include actions that minimize the number of informal trails, thus concentrating impact to a limited number of designated areas.

5. All use of Monument lands should be non-consumptive.

thanks,

█

█

█
█
█



"You noticed nobody gives a damn about beached minnows."



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Resource Mgmt, National Monument in the San Juan Islands

Sun, Mar 29, 2015 at 5:50 PM

To: [REDACTED]
blm_or_sanjuanislandsnm@blm.gov

Dear BLM,

I was born and raised on the south end of Lopez Island and have been to every nook and cranny of all the national monument lands on Lopez. I was opposed to listing them as a National Monument and my request as you move forward in managing these lands is that you do not for one moment stop working to reduce human impact, hopefully by keeping part of these lands as untouched as possible. These are sacred lands to me. I have spent many hours in quiet reflection here, teenage parties, my own wedding, community potlucks, Easter Egg hunts, May Day parties, and on and on. Fishing. Exploring. Swimming. As you manage these lands think of these traditional uses of these lands, and don't make them into some crawling with tourists spectacle. These lands are fragile. They have delicate plants, swampland areas, and are home to wild critters. Do not let them be so overrun by people that eagles don't want to nest there.

Thank you,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Comments on RMP for National Monuments

Mon, Mar 30, 2015 at 11:18 AM

[REDACTED]
To: blm_or_sanjuanislandsnm@blm.gov

Dear Resource Management Plan Committee,

Thank you for considering our comments in the management of the San Juan Islands National Monuments. I would like to express my support in fostering a plan that honors and supports the living spiritual connection between the Lopez Community and the National Monuments lands on Lopez Island. I support the comments below submitted by Faith Van de Putte.

1) Iceburg Point, Whatmough Bite, Point Coleville and Chadwick Hill have been places that the Lopez community I know has used for social gatherings, celebrations, contemplation and sacred space. I have been to weddings at Whatmough, memorials at Iceburg, circles of song and silence at Coleville and spent three days and two nights fasting on top of Chadwick Hill during a time of deep personal questioning. We often hear about how place and landscape was sacred to the native peoples. I think it is important for the RMP to recognize that these places have not only been sacred historically but continue to be in the contemporary Lopez culture. As these lands have become more assessable and "discovered" I have noticed that they are used less for community gatherings of a contemplative or sacred nature. I request that the RMP acknowledges the living spiritual connection between the Lopez Community and these lands and creates an avenue for them to be legally used for such purposes as solo visioning retreats, coming of age ceremonies, memorials, and celebrations marking the Solstices and equinoxes.

2) Iceburg Point and Whatmough Bay are the more well known of the Lopez monument lands. Point Coleville and Chadwick Hill are not as frequented or known and I request that the management of these two places attempt to preserve this. I believe this could be done with minimal signage, minimal or no featuring in print material and no media attention directed to these sites. They will of course be on the map, but we can decide to manage them in a way that does not draw additional attention.

3) I request that the signage used be low visual impact.

4) As more visitors use these sites I notice the increase in trails, especially at Iceburg, and request low impact signage asking people to stay on designated trails.

Thank you,
[REDACTED]

received 3/30/14
mdeC

March 24, '15

Dear Marcia & Nick,

Thank you for asking for input on the SJ Islands Nat'l. Monument land. I have been meaning to write to you since last fall.

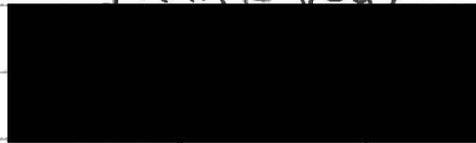
I (along with many of my friends & neighbors) think hunting is not compatible with the current use of Lopez Nat'l. Monument/BLM land. Over the past few years BLM has worked hard to make these beautiful public spaces more accessible & to encourage people to use them (both locals & tourists). And we do use them & love them.

But for most of the Fall the BLM/Monument lands are dangerous because of hunters. These are places that people go to with their children & dogs. That old people & young people go to. Hunting does not mix well with this use. Lopez is too populated & the parks are too popular for hunting to be safe. I heard of several scary, dangerous & disturbing incidents on the park lands this Fall. Many people just stopped going for walks

during the long hunting season. For those of us on the Southend of Lopez, the BLM/Monument lands are about the only public access trails, beaches & outlooks we have.

Please consider this seriously - before there is ~~any~~ an accident. Let people hunt in more remote areas where there aren't families & neighbors & tourists trying to enjoy nature in peace & safety.

Thank you,





SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Comments regarding the San Juan Islands National Monument Resource Management Plan

[REDACTED]
To: sanjuanislandsnm@blm.gov

Mon, Mar 30, 2015 at 5:20 PM

March 30, 2015

Comments to the San Juan Island National Monument Team

[REDACTED]

Thank you for the public slide presentation on Orcas Island showing the San Juan Islands National Monument and for requesting comments regarding the first Resource Management Plan. Please address the following concerns:

San Juan Islands National Monument is the nation's smallest National Monument and will be adversely affected by sea level rise resulting from climate change. Please discuss this process and policies to protect habitat areas and wildlife of the Monument.

Many areas of the Monument's acreage are low-lying rocks and shorelines. As the sea level rises, the lowest lying acreage will disappear below sea level. Please include policies and mechanism for expansion of land acreage. Include how to inform Island land owners as well as other public agencies within the Monument boundary about how they can make donations of land to the Monument.

Address necessary staffing levels to successfully manage the spread out and marine nature of the Monument.

Discuss the threat and risks to the Monument's shoreline from the increased coal tanker traffic from current or future terminals in NW Washington and/or Canada. What steps can the BLM take to decrease these threats including directly opposing the increased shipping?

Discuss public use in the context of protection of wildlife and habitat. And, if public access is appropriate, provide maps that show where access is located. Explain where maps can be located.



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Scoping Comment for the San Juan Islands National Monument Resource Management Plan

[Redacted]

Tue, Mar 31, 2015 at 10:20 AM

To: sanjuanislandsnm@blm.gov, blm_or_sanjuanislandsnm@blm.gov

Scoping Comment for the San Juan Islands National Monument Resource Management Plan

To whom it may concern;

I am a year-round resident of the San Juan Islands. A major marine oil spill is the greatest threat to our San Juan Islands National Monument shorelines, wetlands, marine mammals, sea birds and other living creatures within Monument jurisdiction. Please include bunker fuel, crude oils, diluted bitumen, and Bakken Shale oil in examining the dangers to wildlife and property, and include strategies for prevention, mitigation, clean-up, and restoration.

In developing the Resource Management Plan for the San Juan Islands National Monument, please examine how the BLM will address the threat of a major oil spill given the projected massive increase in tanker and bulk cargo vessel traffic in addition to the variety of existing vessels transiting the San Juan Archipelago.

One important mitigation measure would be to support efforts to station an industry-funded Emergency Towing Rescue Vessel near Turn Point/Boundary Pass. Turn Point/Boundary Pass has been designated by the U.S. Coast Guard as a Special Operating Area because it is one of the most dangerous and heavily used marine passages on the west coast of North America. This tug would be powerful enough to assist even the largest vessels in distress and therefore prevent or reduce the magnitude of a major fossil fuel spill. Large container ships can be carrying between one and two million gallons of heavy bunker fuel for propulsion of the vessel. The larger oil tankers must have tug escorts, but container ships and many oil barges are not required to have tug escorts.

Secondly, please consider funding an on-going education campaign to teach recreational boaters to always pass astern of large vessels. All recreational boaters, including sail boats, are required to pass astern of vessels being guided by the U.S./Canadian Vessel Traffic Service. In addition to our human laws, common sense and the laws of physics teach us that large vessels cannot easily slow down and are less maneuverable compared to smaller recreational boats. If the pilot of a large cargo ship or oil tanker must decide between endangering human lives or running aground, they face a difficult decision.

[Redacted signature block]



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Scoping Comment for the San Juan Islands National Monument Resource Management Plan

[Redacted]
To: sanjuanislandsnm@blm.gov

Tue, Mar 31, 2015 at 10:37 AM

To whom it may concern;

I am a year-round resident of the San Juan Islands. I am concerned about climate change impacts to the San Juan Islands National Monument. Please study the probabilities of increased diseases which might affect forests, meadow lands, and wetlands, including impacts on food abundance and population sustainability for all species of animals inhabiting Monument lands and waters.

Secondly, please evaluate the potential for increased wildfires associated with rising temperatures and changes in rainfall patterns within the Monument's jurisdiction. I encourage you to include controlled burning as a way to address forest understory fuel loads and as a method to rejuvenate grass lands.

Thirdly, please evaluate the climate change impacts of ocean acidification and sea level rise on Monument lands and waters in the development of the Resource Management Plan for the San Juan Islands National Monument.

Include me in your contact list for future information and updates.

[Redacted signature block]



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Scoping Comment for the San Juan Islands National Monument Resource Management Plan

[Redacted]
To: sanjuanislandsnm@blm.gov

Tue, Mar 31, 2015 at 10:54 AM

To whom it may concern:

I am a year-round resident of the San Juan Islands. I am very concerned about the consequences of using dispersants as a means of reponding to significant oil spills in the marine waters surrounding the San Juan Islands National Monument. Dispersants used in the Gulf of Mexico BP oil spill have been found to more toxic to the biota of the gulf than the massive amount of crude oil that was spilled. Long term studies on efficacy and safety need to be conducted and continued before the use of dispersants can be determined to be appropriately useful in oil spill circumstances, particularly in our high current turbulent tidal waters, and complex shorelines.

Please formulate a scientifically responsible position on how the BLM will address dispersant use within it's jurisdiction and what effects such dispersant use would have on the biota, shorelines, and wetlands of the Monument in the course of developing the Resource Management Plan for the San Juan Islands National Monument.

I have attached and copied, below, more detailed information from recent studies that show the negative impacts of dispersants.

[Redacted]

San Juan County is at ever-increasing risk for a major oil spill as vessel shipping traffic increases. Vessel traffic will significantly increase in San Juan County waters because of proposed major fossil fuel export facilities and expansion in the capacity of existing facilities.

In the event of a major oil spill, San Juan County must have an established policy on the use of dispersants. A major oil spill occurred in the Gulf of Mexico following the explosion of the Deepwater Horizon drilling platform. New data has recently been published on the toxicity of the major dispersant used in this disastrous spill. The bottom line is that the oil alone kills around 20% of zooplankton, an essential component of the marine food web. When the dispersant used in the Gulf of Mexico was added, around 70% of the zooplankton died. Use of dispersants can result in a much greater impact on the marine environment than the impacts of oil alone. The use of dispersants in the Salish Sea should be avoided until studies using protocols similar to those used in the studies described below are carried out for the types of crude oil being transported through our marine waters and for the types of dispersants that are proposed to be used.

About Zooplankton:

Most life on our planet is sustained by plants that use the sun's energy to convert carbon dioxide and water to energy-rich glucose. Net primary productivity is a measure of the rate of transformation of chemical or solar energy to biomass. In contrast to land, where vascular plants carry out most primary production, the bulk of primary production in the oceans occurs in microscopic floating algae known as phytoplankton. Net primary productivity depends not only on sunlight, but on nutrient cycling which is enhanced along many coastlines (as indicated by the orange to red continental margins in the NASA graphic in the attached .pdf). The waters of the Salish Sea and the San Juan Archipelago are rich in phytoplankton that thrive because of enhanced nutrient recycling in the region's coastal waters. Phytoplankton is food for tiny floating animals called zooplankton. Larger marine animals feed on the zooplankton. The complex food web that sustains marine mammals, birds, fish, shellfish, crabs, shrimp and other larger animals would not exist without zooplankton. Both phytoplankton and zooplankton are essential for sustaining marine life.

Oil Spill Dispersants And Zooplankton Mortality

Oil dispersants have been used because they are thought to lessen ecological impacts along sensitive marine shorelines. In studies following the Deepwater Horizon spill in the Gulf of Mexico, Gulf zooplankton populations exposed to crude oil showed an approximate doubling in mortality compared to zooplankton in sea water without crude oil. When the zooplankton were exposed to crude oil plus a dispersant, Corexit 9500A, the mortality was 3.4 times higher than for exposure to crude oil alone. Zooplankton exposed to the dispersant Corexit 9500A without oil showed an approximate doubling in mortality compared to zooplankton exposed to oil without the dispersant. These results show that the dispersant Corexit 9500A kills zooplankton at significantly higher rates than does oil alone. Corexit 9500A plus crude oil killed about 70% of the zooplankton compared to a loss of around 20% for crude oil alone. See Figure 5 in:

Interactions between zooplankton and crude oil: toxic effects and bioaccumulation of polycyclic aromatic hydrocarbons. [Almeda R, Wambaugh Z, Wang Z, Hyatt C, Liu Z, Buskey E.J., PLoS One. 2013 Jun 28](#)

<http://www.plosone.org/article/info%3Adoi%2F10.1371%2Fjournal.pone.0074476>

Significant reductions in zooplankton numbers would affect virtually every animal that relies on this vital component of the marine food web. Animals that spend the early stages of their life cycle as plankton have also been shown to be adversely affected by the dispersant Corexit 9500A. For example, see:

[Mar Environ Res](#). 2014 Aug;99:212-7. doi: 10.1016/j.marenvres.2014.06.007. Epub 2014 Jun 24.

Dispersant Corexit 9500A and chemically dispersed crude oil decreases the growth rates of meroplanktonic barnacle nauplii (*Amphibalanus improvisus*) and tornaria larvae (*Schizocardium* sp.).

[Almeda R](#)¹, [Bona S](#)², [Foster CR](#)³, [Buskey EJ](#)³.

Author information

Abstract

Our knowledge of the lethal and sublethal effects of dispersants and dispersed crude oil on meroplanktonic larvae is limited despite the importance of planktonic larval stages in the life cycle of benthic invertebrates. We determined the effects of Light Louisiana Sweet crude oil, dispersant Corexit 9500A, and dispersant-treated crude oil on the survival and growth rates of nauplii of the barnacle *Amphibalanus improvisus* and tornaria larvae of the enteropneust *Schizocardium* sp. Growth rates of barnacle nauplii and tornaria larvae were significantly reduced after exposure to chemically dispersed crude oil and dispersant Corexit 9500A at concentrations commonly found in the water column after dispersant application in crude oil spills. We also found that barnacle nauplii ingested dispersed crude oil, which may have important consequences for the biotransfer of petroleum hydrocarbons through coastal pelagic food webs after a crude oil spill. Therefore, application of chemical dispersants increases the impact of crude oil spills on meroplanktonic larvae, which may affect recruitment and population dynamics of marine benthic invertebrates.

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KEYWORDS:

Cirripede nauplii; Crude oil; Dispersant Corexit 9500A; Environmental pollution; Growth rates; Meroplanktonic larvae; Sublethal effects; Tornaria larvae; Toxicity

Shell fish spend their early life as plankton. These commercially important animals would likely show a reduction in numbers of adults if dispersants caused significant mortality in the planktonic stage.

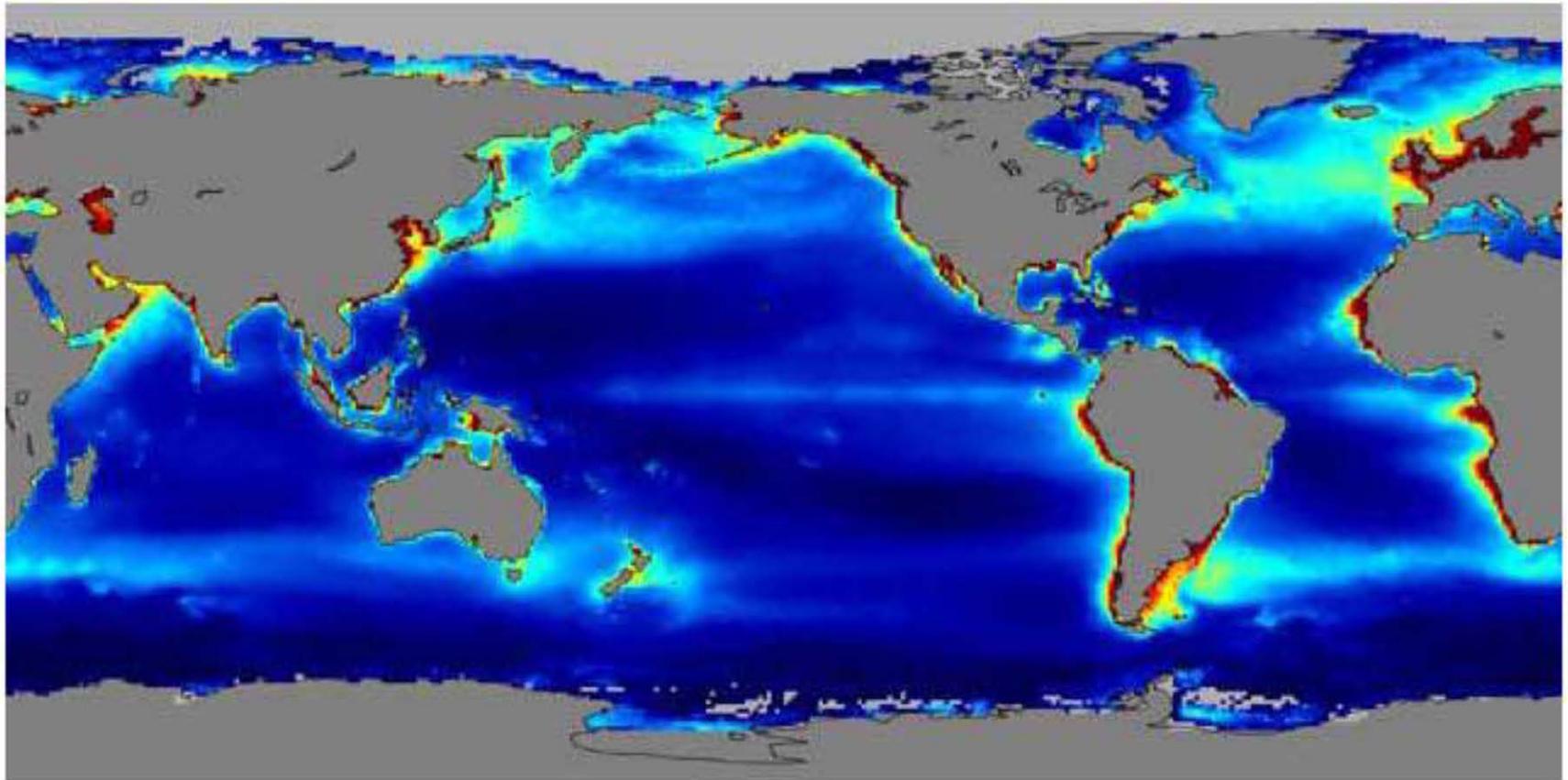
If dispersants used during a major oil spill in our region significantly increased the mortality of zooplankton, growth rates of larger marine animals would slow and many animals die from lack of adequate food. We can no longer assume that the effects of dispersants on our near-shore marine ecosystems are beneficial or even neutral. The results of the studies described above indicate that the use of dispersants in the Salish Sea should be avoided until studies using protocols similar to those used in the Almeda et al. studies are carried out for the types of crude oil being transported through our marine waters and for the types of dispersants that are proposed to be used.



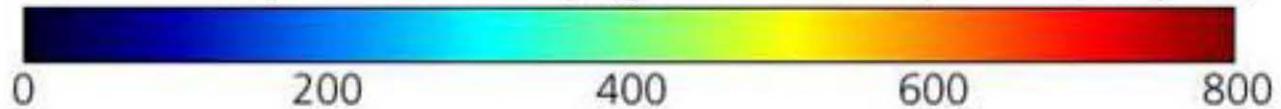
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402K

Negative Impacts of Dispersants



Net Primary Productivity (grams Carbon per m² per year)



Negative Impacts of Dispersants

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Negative Impacts of Dispersants

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KEYWORDS:

Cirripede nauplii; Crude oil; Dispersant Corexit 9500A; Environmental pollution; Growth rates; Meroplanktonic larvae; Sublethal effects; Tornaria larvae; Toxicity

Negative Impacts of Dispersants

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received
March 31, 2015
Mdel

San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

The Bureau of Land Management (BLM) Spokane District is seeking early public input, through a process known as scoping, as it begins preparing a Resource Management Plan (RMP) for the San Juan Islands National Monument. The RMP will provide the goals, objectives, and direction that will guide the BLM's management of the National Monument for the next 15 to 20 years. The BLM defines scoping as a collaborative public involvement process to identify planning issues to be addressed through the plan. For your comment to be reflected in the scoping report, and to be the most helpful for identifying issues to be addressed during the planning effort, please ensure that your scoping comments are submitted or postmarked by April 1, 2015.

The BLM wants to hear from you! The following questions have been provided to help you provide the most useful comments to the BLM but all comments are welcome. Please feel free to attach additional sheets of paper if your comments do not fit below.

1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

Hunting?
Parking?
maintaining open space? horses? trail bikes?

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

No hunting/guns please!

selective clearing to maintain meadows @ Iceberg Pt.

3. What are other topics or concerns that you would like the BLM to address through the planning process?



received
March 31, 2015
M d C

BLM

San Juan Islands National Monument
Resource Management Plan
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1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

- hunting
- parking
- discreet signage
- ? clearing of brush/trees to maintain fields @ Iceberg
- creating trails + limiting access to other places
- usage - ? whether biking + horseback ok
- dogs only on leash

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

- limit commercial or tourist promotion
- education of locals + educational signage
- local stewards
- discreet signage
- clearing brush + small trees @ Iceberg to keep open meadows

3. What are other topics or concerns that you would like the BLM to address through the planning process?





SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Comments on RMP for national Monuments

Tue, Mar 31, 2015 at 8:41 AM

To: blm_or_sanjuanislandsnm@blm.gov

Dear Resource Management Plan committee,

I am writing in support of the comments made by Faith Van de Putte that are copied below. Also as a Certified Arborist I am concerned about the health of the forest and the ecosystems associated with them. One of my concerns is the encroaching growth happening at Iceberg. It used to be much more open and in a handful of years from now it will be almost unrecognizable as what it once was and the open field habitat will be gone.

There are not that many places on Lopez or the rest of the islands with the same habitat and so I encourage the maintaining of what we have. The natives used to do prescribed burns every few years. After talking to employees of the California parks where they are doing prescribed burns I find myself in favor of doing the same thing here. Granted it will take a lot of work to make it happen safely I think it will be worth the effort.

There are other potential was to maintain the forest and ecosystem health if burning is deemed undoable. Please consider all options available for the maintaining of the ecosystem with the ecosystem being the one longterm goal.

Thanks,

Thank you for considering my comments regarding the Resource Management Plan (RMP) for the San Juan Islands National Monument. I grew up on Lopez Island and my relationship with the four main Monument lands on Lopez Island: Iceberg Point, Watmough Bite, Point Coleville and Chadwick Hill goes back to before they were public or widely known outside of the local community. I have seen the impact to the landscape and to the relationship between the local community and the lands. These four places are the most accessible of the Monument lands and I think warrant special consideration.

1) Iceberg Point, Watmough Bite, Point Coleville and Chadwick Hill have been places that the Lopez community I know has used for social gatherings, celebrations, contemplation and sacred space. I have been to weddings at Watmough, memorials at Iceberg, circles of song and silence at Coleville and spent three days and two nights fasting on top of Chadwick Hill during a time of deep personal questioning. We often hear about how place and landscape was sacred to the native peoples. I think it is important for the RMP to recognize that these places have not only been sacred historically but continue to be in the contemporary Lopez culture. As these lands have become more assessable and "discovered" I have noticed that they are used less for community gatherings of a contemplative or sacred nature. I request that the RMP acknowledges the living spiritual connection between the Lopez Community and these lands and creates an avenue for them to be legally used for such purposes as solo visioning retreats, coming of age ceremonies, memorials, and celebrations marking the Solstices and equinoxes.

2) Iceberg Point and Watmough Bay are the more well known of the Lopez monument lands. Point Coleville and Chadwick Hill are not as frequented or known and I request that the management of these two places attempt to preserve this. I believe this could be done with

minimal signage, minimal or no featuring in print material and no media attention directed to these sites. They will of course be on the map, but we can decide to manage them in a way that does not draw additional attention.

3) I request that the signage used be low visual impact.

4) As more visitors use these sites I notice the increase in trails, especially at Iceberg, and request low impact signage asking people to stay on designated trails.

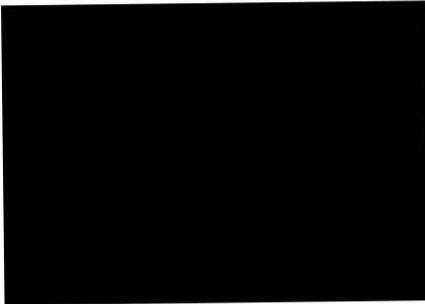
[REDACTED]

received 3/31/15
Mdc

San Juan Islands National Monument

Resource Management Plan

Scoping Comments



Dear SJINM,

I live full time on Lopez Island for the past 15 years and also volunteer my time as a docent at the Patos Island Lighthouse. I have walked many times per year our Lopez National Monument lands, of Iceberg Point, Point Colville and Watmough.

I have many concerns about how these lands will be managed. The issues I have are the following:

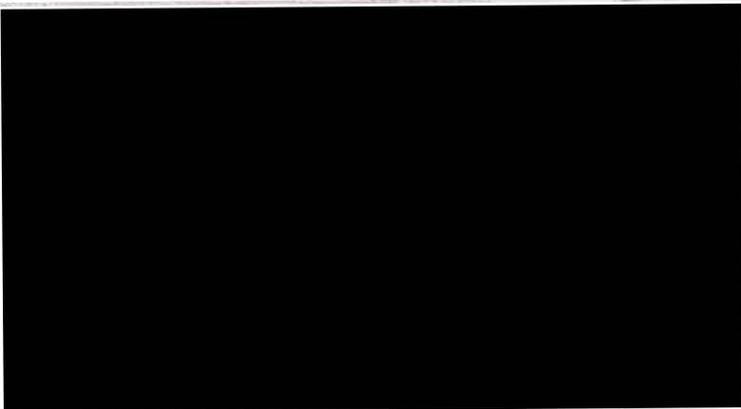
1. Opening hours have been explained to me for the Lopez National Monument lands as Dawn til Dusk. I agree that no camping should be allowed, but we need to define what camping is, in the Resource Management plan, such as setting up a tent, sleeping in a sleeping bag, cooking with a fire. Night time wild lands are equally important as day time natural lands for engaging in nature observations, such as star gazing: The San Juan Island's National Monument lands are protected from lights in the immediate area, as well are far enough away from our dense cities to be incredible places to gaze at the night sky, including the Northern Lights. Night sounds from owls, frogs, bats, crickets cannot be heard during the dawn til dusk hours. Many of my friends, and myself included, like to walk in the dark, where our eyes adjust and we use no or very little light to walk through our Lopez National Monument Lands. It is a time we know hunters must stop hunting 30 minutes past sunset, so after dusk is a perfect time to be walking on our lands during hunting season. Safer than walking between dawn and dusk during the current opening hours. Meditative contemplation is better done in the dark hours than in the light hours. I spent some recent time with a Lummi member, Charles, that lived part time on Lopez Island. He currently resides at an assisted living apartment on the Lummi reservation. He walked every single night he was on Lopez, for 6-8 hours at night, and enjoyed Iceberg and Point Colville during his walks. I agree with regulating camping, but I do not agree with closing these beautiful lands to nighttime human visitors, walking through the landscape or sitting quietly contemplating the night sights and sounds. If the lands can be opened up for the purpose I mention, I would recommend some restriction on larger congregations of people, with the intent to have a party, that would not have the best interest of the lands or the ecological values in mind.
2. Ecological values are high on my list for both plants and animals, including soil erosion prevention. Trails should be marked and very nice and pleasantly worded signs should

education visitors about the fragility of the landscape and the recommended ecological best practice for enjoying the environment. Multiple trails that go the same place should be managed, by naturally blocking them off, as the National Parks and State Parks do. Educational information should be available on line, or if possible at the individual sites, as the State Parks do. Patos is a good example of a simple reader board for ecological information.

3. Invasive species need to be controlled, as well as including a budget for educating neighbors, or renting tools out to neighbors, for the removal of stubborn species like Scotch Broom.
4. Native Species need to be protected as needed, if are located near high use areas, or if they are endangered by fencing them off. On Patos, let's take care not to mow down the flowering Camas, as I believe they need to restore their bulb strength by the dying foliage, as daffodils do. Can we mow them later in the spring? Or do the research to understand if we are damaging them by mowing them before their foliage has dried up.
5. Hunting on our National Monument Lands needs to stop, or highly restricted and regulated, where other recreation is not allowed at the same time. There are too many recreational walkers and nature visitors to Iceberg, Pt. Colville and Watmough to allow hunting with rifles of any sort.
6. Human powered noise needs to be studied, and a solution needs to be found about the intensity of noise of the Growlers over our National Monuments.
7. About Harvesting Divers: Last summer I was on Patos, when commercial harvest dive boat spent 2-3 hours right off shore with an amplified megaphone from the divers communicating to the boat. It was like listening to a loud speaker at a football game, it was that amplified by the way noise travels across the water.

I understand the State Fishery regulates the shellfish and sea harvests, but the noise effects all on land in the surrounding area. I believe this happens also at Iceberg and Point Colville.

Perhaps we can have a voice with the State Fisheries to have some waterways surrounding our National Monuments, designated as restricted seabed's, from harvests, and are preserved from being harvested for human consumption.





SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

Monument comment

Tue, Mar 31, 2015 at 8:59 AM

To: blm_or_sanjuanislandsnm@blm.gov

Cc: Lauren Pidot <lpidot@blm.gov>, Marcia deChadenedes <mdechade@blm.gov>

Dear Monument Advisory Committee,

I take this opportunity to share my thoughts about what the Monument Advisory Committee might offer to support the needs of our community and all the people who visit the San Juan Islands as its plan is developed.

I encourage planners to support the work of our many local organizations, e.g. Land Bank and Preservation Trust, UW Marine Labs, Trails Committee, and many others, in protecting landscapes and species, agricultural lands and their soils, shoreline habitats, and our surrounding Salish Sea, and providing public access and interpretation on public lands as appropriate.

Everyone values the beauty of our region and appreciates protected lands. In addition to aesthetic and recreation benefits, the region's health is served by these lands. Does Monument Status give us an opportunity to discourse about challenges to the health of our terrestrial and aquatic environment?

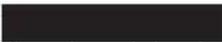
As part of protection of species and habitat I would like to see restrictions on things like nighttime lighting and other human encroachments that disturb wildlife, including noise and pollution from Navy flights, cargo ships, tourist boats, and even certain recreational hiking for the benefit of human, animal, plant, and micro-organism health. Most of all, I would like to see pesticides of all kinds banned from the county--not just on those protected lands and waters but everywhere; pesticides are washed into nearby lands, into wells and aquifers, into shore areas and open waters.

This year, 2015, has been declared by the UN as the International Year of Soils in an move to steer efforts toward restoration of that which has been lost everywhere to conventional agriculture, destruction of forests and wild lands, and development. Pesticides, including herbicides, insecticides, fungicides, have been used in agriculture, landscaping, parks & golf courses, roadsides, building construction and protection, clothing, cleaning and personal products, and much more, to the detriment of soil, water, and air health, and the health of the life forms they support. In order to guarantee healthy soils, there must be micro-organisms. And in order to guarantee food, there must be pollinators, which are increasingly challenged by pesticides. The San Juan Islands recently declared the county GMO-Free. The legislation may not have strength, but it's a good start. Companion legislation could make us Pesticide-Free.

Though the BLM does not have jurisdiction over private, city, and county lands, its position on these matters would contribute to public discourse and action.

Thank you.

Sincerely,


San Juan Island



SanJuanIslandsNM, BLM_OR <blm_or_sanjuanislandsnm@blm.gov>

San Juan Islands National Monument

[REDACTED]
To: blm_or_sanjuanislandsnm@blm.gov

San Juan Islands National Monument scoping comments:

The purpose of the National Monument is to preserve, protect and restore.

We are concerned that this purpose may not be held closely in mind as plans are made to manage the monument islands and rocks. In our over 50 year time on San Juan Island, we have seen how greatly humans impact the natural world. Salmon and bottom fish stocks are down, because of overfishing. Human traffic on fragile islands destroys native plant life. Humans exploring rocky outcrops disrupt and destroy the environment of a multitude of sea creatures. To preserve, protect, and restore the rocks and islands of the San Juans, human interaction with these islands must be limited—where rocks and islands have been undisturbed, they should remain so. I strongly urge the planners to consider carefully what the effect of any decisions would be on the natural life that the monument is designed to preserve, protect, and restore.

Sincerely,

[REDACTED]

Friday Harbor

received
3/31/15
MDC

San Juan Islands National Monument
Resource Management Plan
Scoping Comment Form

The Bureau of Land Management (BLM) Spokane District is seeking early public input, through a process known as scoping, as it begins preparing a Resource Management Plan (RMP) for the San Juan Islands National Monument. The RMP will provide the goals, objectives, and direction that will guide the BLM's management of the National Monument for the next 15 to 20 years. The BLM defines scoping as a collaborative public involvement process to identify planning issues to be addressed through the plan. For your comment to be reflected in the scoping report, and to be the most helpful for identifying issues to be addressed during the planning effort, please ensure that your scoping comments are submitted or postmarked by **April 1, 2015**.

The BLM wants to hear from you! The following questions have been provided to help you provide the most useful comments to the BLM but all comments are welcome. Please feel free to attach additional sheets of paper if your comments do not fit below.

1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

- A. Hunting with heavy recreational use
- B. Use of herbicides or Roundup
- C. Lack of parking at Pt. Colville & Watmough Bay
- D. Increasing noise from NAVY base on Whidbey Island
- E. Over use of Watmough Bay

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

- A. Ban hunting in S.J. Is. monument
- B. Ban herbicides & Roundup
- C. Develop new parking between Watmough & Pt. Colville (Being aware power line is private land)
- D. Record sound baseline data
- E. So far even with 60 people on beach during summer weekends it's ok, but keep a track of numbers & overuse

3. What are other topics or concerns that you would like the BLM to address through the planning process?

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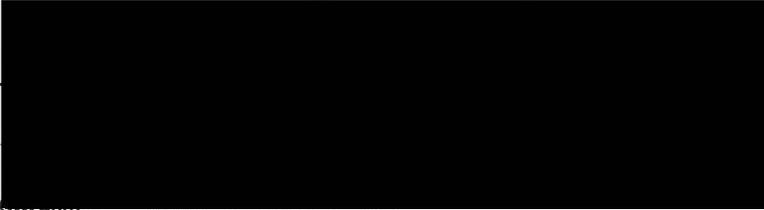


4. Other thoughts or suggestions?

Good work Nick, Marcia & volunteers!

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Name:



Mailing

Email Address

Please indicate your affiliation by checking one of the following boxes:

- Individual (no affiliation)
- Private Organization
- Citizen's Group
- Elected Representative
- Tribal, Federal, State, or Local Government

Name of organization, government, group, or agency (if applicable) BLM monitors

Comments may be submitted via the following methods:

**Email:** [blm\\_or\\_sanjuanislandsnm@blm.gov](mailto:blm_or_sanjuanislandsnm@blm.gov)

**Mail:** San Juan Islands National Monument RMP, P.O. Box 3, Lopez, WA 98261

**Hand delivery:** At a public meeting or BLM Lopez Island Office, 37 Washburn Place, Lopez Island, WA 98261

**Fax:** 503-808-6333





SanJuanIslandsNM, BLM\_OR <blm\_or\_sanjuanislandsnm@blm.gov>

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## Please include me on the mailing list

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Sat, Mar 7, 2015 at 9:06 AM

[REDACTED]  
To: blm\_or\_sanjuanislandsnm@blm.gov

I'm all for National Monument Status if it will protect our extraordinary and beautiful area of the Northwest.  
Thank you,  
[REDACTED]



SanJuanIslandsNM, BLM\_OR <blm\_or\_sanjuanislandsnm@blm.gov>

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## BLM San Juan National Monument scoping

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[REDACTED]  
Reply-To: Laura Derevensky <dmacathome@earthlink.net>

To: sanjuanislandsnm@blm.gov

Dear BLM representatives,

As you consider possible uses for the small BLM islands in the San Juan Island areas, I would like to suggest possible areas of concern, especially for the smallest islands. Areas of concern that should certainly be considered are damage to the intertidal ecosystem by public foot traffic trying to access the BLM property above mean high tide, degradation of island ecosystems by unsupervised use, use of small islands with no restroom facilities, which will inevitably lead to human waste being left on these islands, with accompanying possible transfer of pathogens and drug residue, such as antibiotics and hormones, to the marine ecosystem. Additional areas of concern would be displacement of wildlife like seals, eagles and otters, and overharvesting of shellfish. I know that on the small island visible from my island home (site 13-89 NNW Pile Point), I frequently see an eagle standing at the summit, sometimes for hours at a time, and also see seals and their pups pull up onto the island. I would suggest that BLM lands in the National Monument be closed to the public to "preserve, protect, and restore", except for larger islands, and then only if the sites will be supervised, and above all, monitored for ecological degradation. Thank you for allowing me to share my concerns.

Sincerely,

[REDACTED]



SanJuanIslandsNM, BLM\_OR <blm\_or\_sanjuanislandsnm@blm.gov>

## Scoping Comment for the San Juan Islands National Monument Resource Management Plan

Wed, Apr 1, 2015 at 3:49 PM

To: blm\_or\_sanjuanislandsnm@blm.gov, sanjuanislandsnm@blm.gov

To whom it may concern;

I am a year-round resident of the San Juan Islands who cares deeply about the health of our marine ecosystems. Shoreline development can negatively affect our marine ecosystems.

Road access for Iceberg Point is currently located along MacKaye Harbor Road on Lopez Island. Visitors to Iceberg Point often use the four parking spaces at the San Juan County Park at Agate Beach. People may park for 72 hours along county road shoulders, but MacKaye Harbor Road is narrow and the segment of MacKaye Harbor Road along Agate Beach County Park is threatened by buff erosion. MacKaye Harbor Road north of Agate Beach County Park is vulnerable to sea level rise.

In developing the Resource Management Plan for the San Juan Islands National Monument, please examine how the BLM will address access and parking for Iceberg Point. The San Juan County Park at Agate Beach is **Tax Parcel Number: 242413008000**. A map of this parcel (from the San Juan County interactive mapping application POLARIS) is attached to this comment letter. The red line shows eroding bluffs. The brown shows rocky areas.

San Juan County intends to study relocation of the county road within the county park parcel. If San Juan County decides to relocate the county road inland, local non-profit organizations, such as the Friends of the San Juans, can apply for Salmon Recovery funding to remove the deteriorating shoreline stockade (bulkhead) and restore the natural coastal buff erosion that maintains local sandy beaches and forage fish spawning habitat.

I request that the scope of the National Monument Resource Management Plan include plans to work with both San Juan County and local non-profit organizations during road relocation planning and near-shore habitat restoration planning to address the limited parking for visitors to Iceberg Point.

I also request that the scope of the National Monument Resource Management Plan include studying the prohibition of future shoreline modifications in near-shore areas that are priority salmon habitat or forage fish spawning habitat.

Lastly, I request that the scope of the National Monument Resource Management Plan include studies of the feasibility of the removal of existing shoreline modifications in near-shore areas that are priority salmon habitat or forage fish spawning habitat. Shoreline modifications are the second largest threat to the health of marine ecosystems in the San Juan Archipelago and Puget Sound. A major oil spill is first.

Further information on near-shore habitats is available from the Friends of the San Juans, PO Box 1344, Friday Harbor, WA 98250. 36-378-2319. Links to publications can be found at:

<http://www.sanjuans.org/NearshoreStudies.htm>

[Redacted]

**Tax Parcel Number:** 242413008000  
**Owner:** SAN JUAN COUNTY PARKS AND RECREATION  
**Address:**

[Redacted]

**Short Legal Description:**  
PR GL 4 EX CO RD COUNTY PARK Sec 24, T 34N, R 2W

**Tax Area:** LOPEZ  
**Tax Status:** EX

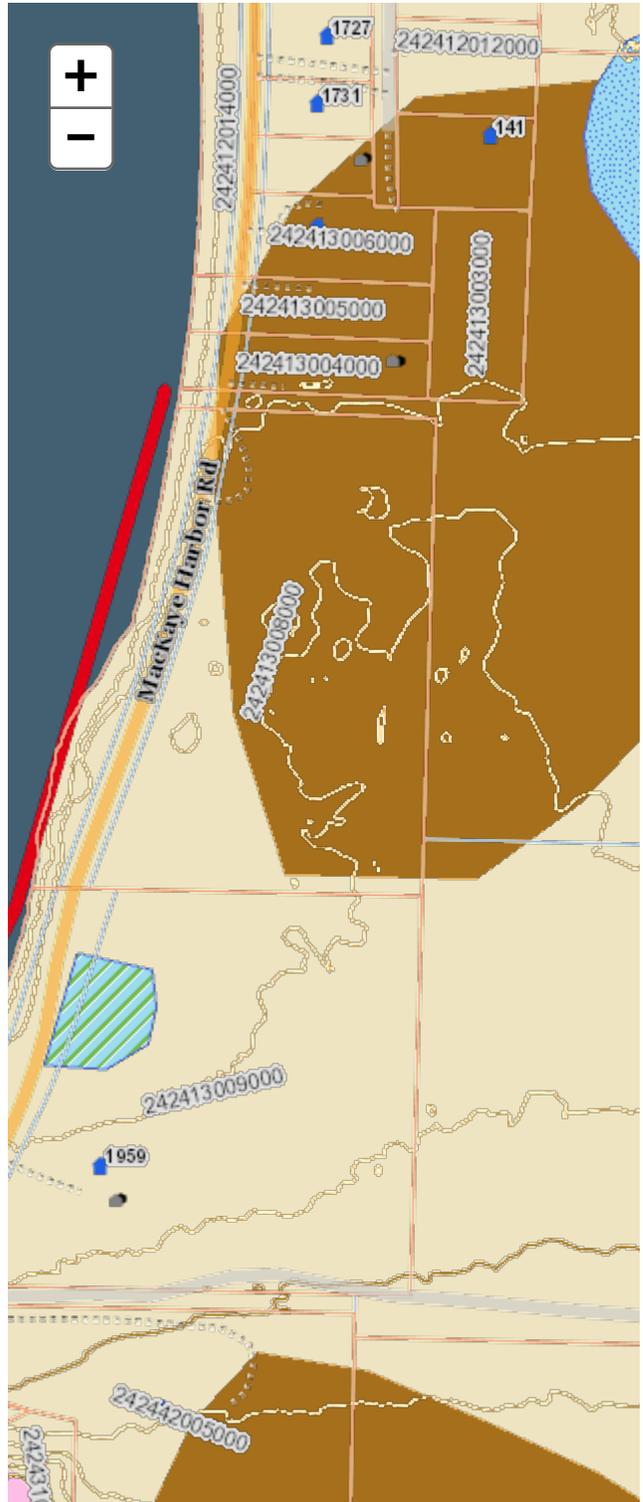
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 **Agate\_Beach\_County\_Park.pdf**  
328K



Help

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| Legend                                                                                               |
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| Format: <input type="text" value="PDF"/>                                                             |
| Layout: <input type="text" value="Tabloid_Lands"/>                                                   |
| 1.  <b>My Map</b> |





SanJuanIslandsNM, BLM\_OR <blm\_or\_sanjuanislandsnm@blm.gov>

## San Juan Islands National Monument Resource Management Plan

Wed, Apr 1, 2015 at 1:28 PM

To: "blm\_or\_sanjuanislandsnm@blm.gov" <blm\_or\_sanjuanislandsnm@blm.gov>

San Juan Islands National Monument Resource Management Plan  
Scoping Comment Form  
April 1, 2015

Dear BLM Folks,

With an estimated 750,000 to 1,000,000 visitors annually to the San Juan Islands, part of the management plan should include seasonal Interpretive Guides at Monument places such as Cattle Point and other high visitor places.

Interpretive Guides can present Monument and ecosystem information, answer questions, helping to manage recreation and visual resources to ensure the protection of the area's ecological values. I find when people learn about the natural history, historical significance, and challenges of an ecosystem, they are more likely to respect the area, and become involved in conservation, preservation, and stewardship.

Thank you for your consideration.

Sincerely,

[Redacted signature block]

View on [www.onboardtourswh...](http://www.onboardtourswh...)

Preview by Yahoo



SanJuanIslandsNM, BLM\_OR <blm\_or\_sanjuanislandsnm@blm.gov>

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## Scoping comments on RMP for the SJ National Monuments

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[REDACTED]  
To: blm\_or\_sanjuanislandsnm@blm.gov [REDACTED]

To whom it may concern,

I am a resident on Lopez island and am writing on behalf of my family of four (my husband and two children). We frequently take walks at Point Coville, Chadwick Hill, Iceberg and Watmough. They all have a very special place in our hearts. I see oil spill risks and overuse of the monument lands as the biggest threats to the health of the monuments.

Oil spill risks: all shipping traffic through Haro or Rosario Straits carries certain risks of oil spills along the shorelines, which would threaten the biodiversity, health and beauty of the SJ National Monuments. RMP needs to consider prevention and mitigation plans, including restoration, allocation of resources or coordination with other agencies involved. Whenever opportunities arise, I hope BLM and its employees would take a position to defend the monuments against greater oil spill risks (due to increased traffic from new proposed projects to export fossil fuels).

Overuse: it is wonderful the local community and visitors are able to enjoy the beauty of the monument lands. It is important to maintain a balance, however, as overuse will lead to deterioration of the monuments, defeating the purpose of "permanent protection" designation of the national monument. Please consider low-impact or no signage where appropriate.

Thank you for this opportunity to comment.

Best regards,  
[REDACTED]



SanJuanIslandsNM, BLM\_OR <blm\_or\_sanjuanislandsnm@blm.gov>

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## Regarding animal activity off of Ferm/Harrington/MacGinitie/Weissinger property on SW side of San Juan Island

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[REDACTED]  
To: blm\_or\_sanjuanislandsnm@blm.gov

Wed, Apr 1, 2015 at 12:15 PM

I don't know the proper name of the island off of property at the end of MacGinitie Rd on San Juan Island. However, we have a view of it that enables us to see the wildlife there.

Over the past several years, it has served as a nesting spot for birds and also a birthing/nursing spot for seal pups. Last summer, at one point there were six(!) seal pups on the small island at the same time. More typically, there's up to four. This happens in the summer months. They seem to be there for several weeks at a time with the mothers actively nursing. At one point last year, a mother was unable to reach her pup (it was high up, tide had gone out, and she seemed clearly frantic) and I stood guard to make sure no one approached the island by kayak to disturb.

I rarely see people on the island kayaking, but it always scares me as so many types of creatures use it as a refuge. About 6-8 years ago, a mother deer gave birth on the island three years in a row and would swim off island to feed and then return to nurse.

It is a regular hunting zone for eagles, who stay there looking out for prey. Just this morning, there were three birds of prey (I think juvenile bald eagles) on the island. More often there are one or two mature bald eagles regularly using it.

The other animals who are regular visitors are otters. There is a family of river otters that uses the bay for fishing and they often scamper up over that island as they are in and out of the water feeding.

In short, it would be a huge disservice to the wildlife in these areas if that very small island, which serves as a refuge for so many animals and birds were to be disturbed by humans. I think the fact that so few people go on it now is what has made it a refuge spot - I implore you to not allow people (kayakers or boaters) to use it, because that would change the wildlife character in this part of the island.

Please consider this input as you consider the future management plan of the area.



SanJuanIslandsNM, BLM\_OR <blm\_or\_sanjuanislandsnm@blm.gov>

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## Fwd: scoping comments

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Wed, Apr 1, 2015 at 5:40 PM

To: [REDACTED]  
To: blm\_or\_sanjuanislandsnm@blm.gov

>  
>  
> Every effort in should be made to restore the lighthouses to a functioning status. The keepers quarters should be made habital again so that they can participate in the lightkeepeers for a week programs, charge a fee which could then be used to help defray expenses of their upkeep and what ever hotel services wold be required for the occupants. The keepers could perform light maintenace task and act as docents for the lighthouses.

>  
> Thanks

>  
> [REDACTED]  
[REDACTED]



SanJuanIslandsNM, BLM\_OR &lt;blm\_or\_sanjuanislandsnm@blm.gov&gt;

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## scoping-SJ islands National MOnument

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To: blm\_or\_sanjuanislandsnm@blm.gov

### HUNTING

Last fall (2014) there was a very serious accident that almost happened. A hunter shot a deer only seconds before a hiker passed through the line of trajectory. Very close call. As supervisor or 43 BLM monitors I withdrew them from duty during the hunting season because of the danger of being shot.

I understand that the BLM has responsibility for the land of the MOnument- its conservation and preservation, but not the animals on the land which the Fish and Wildlife have that responsibility. There is a disconnect here. There may be 3 choices to move out of this danger. (1) Work something out with Fish and Wildlife (2) Work something out with the county. Other places in the county may have problems with shotguns . (3) Make the BLM management plan and see the inconsistencies of compatible use between hunting and recreational walking.

Management Law is inconsistent with ACEC guideline which says these lands must be monitored. BUt it is not safe to monitor them during hunting season and thus is inconsistent with the proclamation for conservation and preservation.

### PARKING FOR WATMOUGH AND PT. COLVILLE

All parcels have an issue regarding parking. The worst is Watmough, which often has an overflow-parking problem with no place to expand. Also Pt Colville parking is extremely limited and any expansion near the trailhead damages root structures of old growth trees..

#### **POSSIBLE LONG TERM PARKING SOLUTIONS**

##### FOR WATMOUGH AND COLVILLE

A larger parking area that would serve both parcels could be placed at the boundary area of Colville right where the public road ends (and private road begins-adjacent to Beck property)). The current Watmough lot could be used as a drop off point and the new parking could be created before the turn down the narrow access road. (about

a 4-minute walk). Colville users would also park in this new lot and this would also be a way of extending use of Colville with a loop trail system from that parking area that could go out to water, linking up with current trails. This would also spread out the use over more of Colville land instead of the heavy use of trail system at the far end of the property. This would also eliminate the need to use the private road.

ACEC DESIGNATION INCLUDED IN SAN JUAN NATIONAL MONUMENT MANAGEMENT

ACEC gives us an extra layer of protection and conservation. WE have had very successful relationship with the BLM with this ACEC designation included in our whole system of use. It should continue to be part of the National Management Guildelines

[Redacted]

-

received 4/1/15  
MdeC

San Juan Islands National Monument  
Resource Management Plan  
Scoping Comment Form

BLM

The Bureau of Land Management (BLM) Spokane District is seeking early public input, through a process known as scoping, as it begins preparing a Resource Management Plan (RMP) for the San Juan Islands National Monument. The RMP will provide the goals, objectives, and direction that will guide the BLM's management of the National Monument for the next 15 to 20 years. The BLM defines scoping as a collaborative public involvement process to identify planning issues to be addressed through the plan. For your comment to be reflected in the scoping report, and to be the most helpful for identifying issues to be addressed during the planning effort, please ensure that your scoping comments are submitted or postmarked by April 1, 2015.

**The BLM wants to hear from you!** The following questions have been provided to help you provide the most useful comments to the BLM but all comments are welcome. Please feel free to attach additional sheets of paper if your comments do not fit below.

1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

- increased public usage
- encourage responsible, informed user behavior
- continued equestrian access in limited, specific areas

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

appropriate signage; where am I? How do I get back to my car?  
education; tread lightly pack it out  
environmental education; what is here, and how do we take care of it?

3. What are other topics or concerns that you would like the BLM to address through the planning process?

Hunter safety + awareness  
Education for both hunters + hikers.

Overuse - How do we keep our much loved areas beautiful + vibrant + peaceful yet accesable



## 4. Other thoughts or suggestions?

See attachments.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Name: \_\_\_\_\_

Mailing \_\_\_\_\_

Email Address: \_\_\_\_\_

Please indicate your affiliation by checking **one** of the following boxes:

- Individual (no affiliation)
                    
  Private Organization
                    
  Citizen's Group  
 Elected Representative
                    
  Tribal, Federal, State, or Local Government

Name of organization, government, group, or agency (if applicable) \_\_\_\_\_

Comments may be submitted via the following methods:

**Email:** [blm\\_or\\_sanjuanislandsnm@blm.gov](mailto:blm_or_sanjuanislandsnm@blm.gov)

**Mail:** San Juan Islands National Monument RMP, P.O. Box 3, Lopez, WA 98261

**Hand delivery:** At a public meeting or BLM Lopez Island Office, 37 Washburn Place, Lopez Island, WA 98261

**Fax:** 503-808-6333



SCOPING COMMENTS  
SAN JUAN ISLANDS NATIONAL MONUMENT  
MARCH 30, 2015

I would like to address my comments towards the Chadwick Hill Area of Lopez Island.

As an adjacent landowner to Chadwick Hill, I am concerned about hikers getting lost on the Chadwick Hill trail system. Hikers often get lost, get turned around and cannot find their way back to their parked car. My family has given directions to many lost hikers who have ended up in our pastures. We have also driven groups of people, which sometimes includes the elderly and young children, back to their cars. This has happened more than once on a hot summer day when the hikers were tired and had limited water.

I would like to suggest maintaining and improving low impact signage to mark trails and private property.

I would like the BLM to continue to allow equestrian use on a limited portion of the Chadwick Hill Trail System. The specific trail I am referencing, which I have marked in blue on the attached map, is a historic equestrian trail. It has been in use for over 50 years. It does not include the upper reaches of the trail system, which includes fragile lichen, moss and wild-flower covered bedrock.

4/1/15 Andra C

This trail runs along the north side of the base of Chadwick Hill.

I would also like to encourage the BLM to consider restoring the historic trails, and creating a new trail system on the northeast portion of the Chadwick Hill area of the Point Colville National Monument Area. I would like to see this low elevation, relatively flat forest area be restored to limited usage, including equestrian use and hiking use. This would be a historic use of this area. Storm damage and natural growth have blocked the pre-existing trails. This area is marked with a pink highlighter on the attached map.

Thank-you,  
With regards,

[Redacted Signature]

4/1/15

# POINT COLVILLE LOPEZ ISLAND

## Recreation Opportunities



Hiking



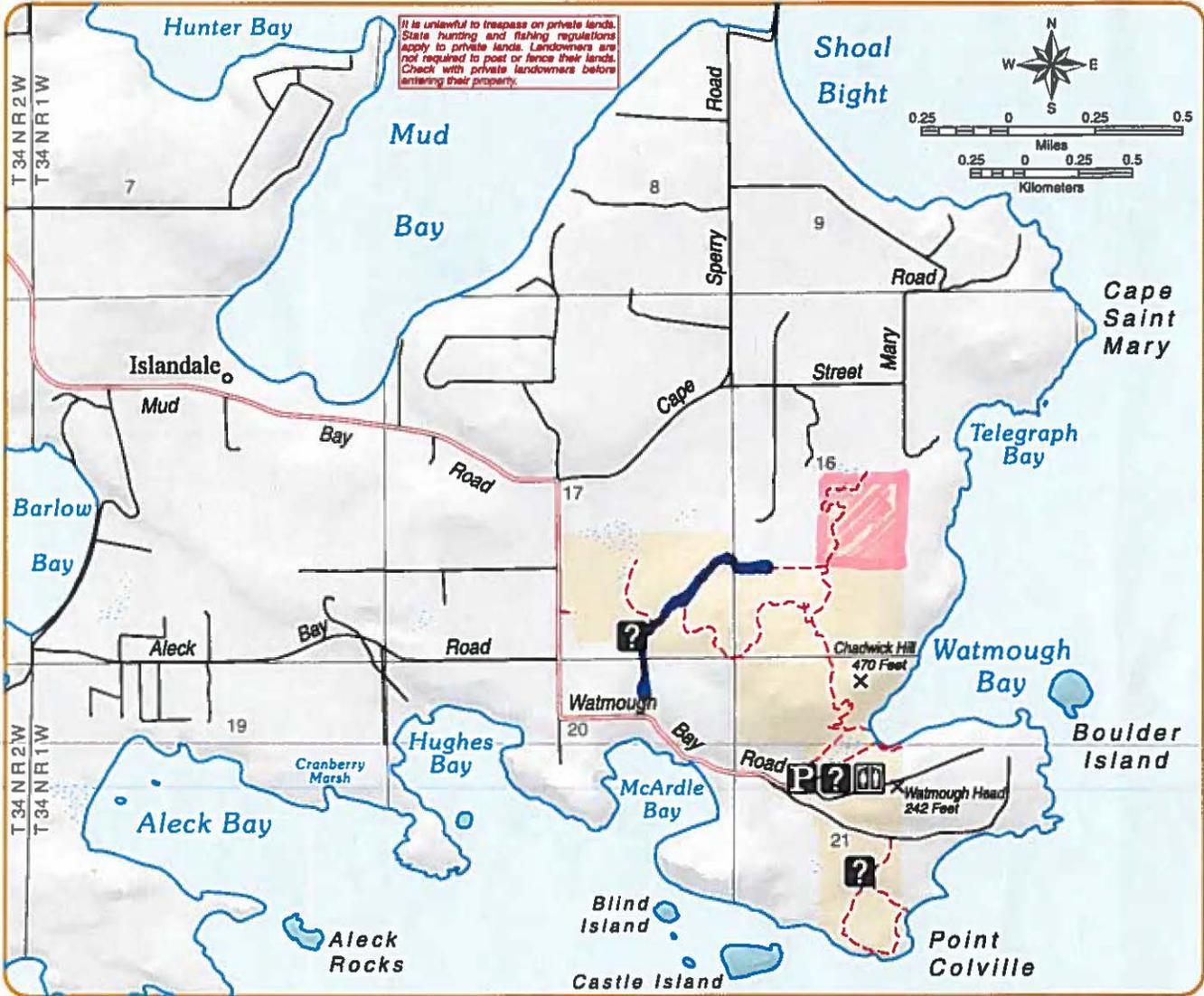
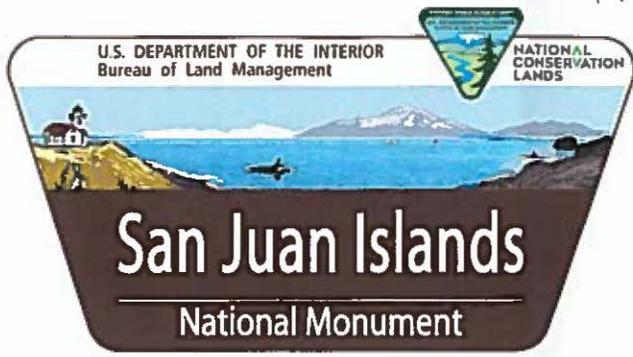
Boating



Fishing

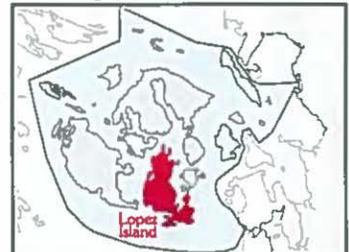


Kayaking



U. S. Department of the Interior  
Bureau of Land Management  
Spokane District

| LEGEND            |                       |                              |
|-------------------|-----------------------|------------------------------|
| <b>Recreation</b> | <b>Transportation</b> | <b>Administered Land</b>     |
| Information       | Access Route          | Bureau of Land Management    |
| Parking           | Improved Road         | US Fish and Wildlife Service |
| Restrooms         | Non-Motorized Trail   | Private or Other             |



San Juan Islands Office  
37 Washburn Place  
Lopez, WA 98261  
(360) 468-3754

Wenatchee Field Office  
915 N. Walla Walla  
Wenatchee, WA 98801  
(509) 665-2100



SanJuanIslandsNM, BLM\_OR <blm\_or\_sanjuanislandsnm@blm.gov>

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## San Juan Island Nat. Monument

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[REDACTED] [REDACTED]  
To: "blm\_or\_sanjuanislandsnm@blm.gov" <blm\_or\_sanjuanislandsnm@blm.gov>

Hi,

I just want to send my comment along.

As a resident of Lopez Island, the two things I would like you to take into consideration: 1. Keep the physical signage to a complete minimum to maintain the charm, magic and wild experience of the place. 2. Keep the public advertizing of this place, via various media avenues, also to a minimum to minimize human impact on the habitat.

Kind Regards,

Kelly Meyer

[REDACTED]  
Lopez Island, WA

received 4/1/15  
MdeC

**San Juan Islands National Monument  
Resource Management Plan  
Scoping Comment Form**

The Bureau of Land Management (BLM) Spokane District is seeking early public input, through a process known as scoping, as it begins preparing a Resource Management Plan (RMP) for the San Juan Islands National Monument. The RMP will provide the goals, objectives, and direction that will guide the BLM's management of the National Monument for the next 15 to 20 years. The BLM defines scoping as a collaborative public involvement process to identify planning issues to be addressed through the plan. For your comment to be reflected in the scoping report, and to be the most helpful for identifying issues to be addressed during the planning effort, please ensure that your scoping comments are submitted or postmarked by **April 1, 2015**.

**The BLM wants to hear from you!** The following questions have been provided to help you provide the most useful comments to the BLM but all comments are welcome. Please feel free to attach additional sheets of paper if your comments do not fit below.

1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

*Please see attached sheet.*

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

*Please see attached sheet.*

3. What are other topics or concerns that you would like the BLM to address through the planning process?



4. Other thoughts or suggestions?

[Empty text box for comments]

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Name: [Redacted] \_\_\_\_\_  
Mailing Address: [Redacted] \_\_\_\_\_  
Email Address: \_\_\_\_\_

Please indicate your affiliation by checking one of the following boxes:

- Individual (no affiliation)
- Private Organization
- Citizen's Group
- Elected Representative
- Tribal, Federal, State, or Local Government

Name of organization, government, group, or agency (if applicable) [Redacted] \_\_\_\_\_

Comments may be submitted via the following methods:

**Email:** [blm\\_or\\_sanjuanislandsnm@blm.gov](mailto:blm_or_sanjuanislandsnm@blm.gov)

**Mail:** San Juan Islands National Monument RMP, P.O. Box 3, Lopez, WA 98261

**Hand delivery:** At a public meeting or BLM Lopez Island Office, 37 Washburn Place, Lopez Island, WA 98261

**Fax:** 503-808-6333



My comments pertain to the Lopez ACEC lands, which I am most familiar with.

April 1, 2015

**1. What issues should be addressed?**

The BLM is very thorough in their analyses and addressing issues—I offer these as the issues that are the most important to me.

- A. Preservation of the properties substantially as they are with the characteristics that warranted preservation in the first place. The properties should not be sold or traded.
- B. Overuse to the point of deterioration of the landscape.
- C. "Advertising" or publicity about the ACEC lands.
- D. Defining and providing adequate parking.
- E. Removal of invasive species and noxious weeds, specifically thistles at Pt. Colville.
- F. The safety of the numerous non-hunting users of the properties during hunting season.
- G. Maintaining an environment that allows enjoyable use without the intrusion of jet noise.

**2. Approaches to addressing these issues.** The letters correspond to the issues above.

A. The VRM class should be a Class I Objective. The ACEC lands should be open for hiking and dogs walked on leashes. Judicious trail development or relocation should be allowed. None of the ACEC lands should be open for bicycles or equestrian use or for hunting. They should not be open for motorized use except for accessing parking areas. No camping should be allowed on the ACEC lands. Other Nat. Mon. lands may be appropriate for camping.

B. The ACEC monitoring program tracks the use and condition of the lands. A specific question could be added to the monitoring form asking about deterioration—trails widening through use, new casual trails, trampling of grasslands, muddy areas, etc.—to see if overuse exists and needs to be dealt with.

C. Information on the ACEC lands should be available to visitors when they seek it—for example in a listing of properties under the heading of the SJINM or at a BLM office near the monument. Singling them out and advertising these properties on district and national websites as travel destinations is not appropriate. National newspaper or magazine coverage is not helpful either. They are getting plenty of use and traffic already, no doubt with more to come, without extra publicity about them.

D. Improved parking is needed at Watmough Bay and Pt. Colville that allow access without overwhelming the properties. Parking areas should be appropriately-sized to the amount of use that these lands can sustain without detriment to the property or the enjoyment of the visitors. The beach at Watmough Bay can handle a sizeable number of people, but if it becomes overrun, people who were looking for a natural experience will wonder why they went to the trouble to come here and battle crowds. A joint parking area for Watmough and Pt. Colville should be visually screened and large enough to handle an appropriate number of visitors without encouraging hordes of people. One-lane two-way roads or parking access should be avoided.

E. The faster the noxious weeds are removed, the more successful the removal will be. Thistles, for example, spread quickly and have gotten more than a foothold at Pt. Colville. This issue needs to be addressed quickly by whatever method the BLM deems appropriate.

F. The number of visitors well into the fall and early winter along with the weekly visits from BLM monitors is not compatible with people shooting bullets through the woods. San Juan County has a law that hunters must have written permission of landowners, which has vastly improved the hunting problems we had in the past. The hunters now know the boundaries of the land they can hunt on and where there are houses, buildings and people. The people know when and where there are people shooting guns. Since hunting is a tricky topic with a mix of jurisdictions, the BLM should collaborate with SJ County and State Fish & Wildlife to find an appropriate way to handle this. The number of non-hunting users vastly outweighs the number of hunters, so closing the properties to non-hunting use during hunting season is not an appropriate solution. Finding a way to close the lands to hunting would be a good choice.

G. The BLM should encourage the Navy to employ measures to reduce the jet noise occurring at the SJINM.

received 4/1/15  
MdeC

**San Juan Islands National Monument  
Resource Management Plan  
Scoping Comment Form**

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**The BLM wants to hear from you!** The following questions have been provided to help you provide the most useful comments to the BLM but all comments are welcome. Please feel free to attach additional sheets of paper if your comments do not fit below.

1. What issues around the BLM's management of the San Juan Islands National Monument should be addressed through this plan? (For example: How should the BLM manage recreation in order to ensure the protection of the area's ecological values?)

#1 Respect adjacent property owners -  
#2 Tread lightly - don't over use.  
#3 put up signs - or better maps

2. What are some approaches to addressing these issues that the BLM should consider through the planning process?

continue monitoring -  
open more trails - spread out impact

3. What are other topics or concerns that you would like the BLM to address through the planning process?

parking  
trash  
trespassing  
Hunting



4. Other thoughts or suggestions?

Keep it Low impact  
"unlike Shark Reef park."  
(over trodden)

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment -- including your personal identifying information -- may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Name: \_\_\_\_\_  
Mailing \_\_\_\_\_  
Email Address \_\_\_\_\_

Please indicate your affiliation by checking one of the following boxes:

- Individual (no affiliation)  Private Organization  Citizen's Group
- neighbor* Elected Representative  Tribal, Federal, State, or Local Government

Name of organization, government, group, or agency (if applicable) \_\_\_\_\_

Comments may be submitted via the following methods:

**Email:** [blm\\_or\\_sanjuanislandsnm@blm.gov](mailto:blm_or_sanjuanislandsnm@blm.gov)

**Mail:** San Juan Islands National Monument RMP, P.O. Box 3, Lopez, WA 98261

**Hand delivery:** At a public meeting or BLM Lopez Island Office, 37 Washburn Place, Lopez Island, WA 98261

**Fax:** 503-808-6333





SanJuanIslandsNM, BLM\_OR &lt;blm\_or\_sanjuanislandsnm@blm.gov&gt;

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## Scoping comments

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Wed, Apr 1, 2015 at 4:06 PM

To: sanjuanislandsnm@blm.gov

Dear BLM:

Thank you for the opportunity to provide comments regarding what should be considered in the RMP for the San Juan Islands National Monument.

### Public access to sites, interpretation and signage:

- BLM should consider which of the sites in the national monument are appropriate for public access with a **strong encouragement to allowing public access**.
- If BLM does not currently have access to a site(s) or currently does not maintain that access, **BLM should secure access and develop access where appropriate**. This may involve working with other governmental and non-profit entities to put together a plan for access. And if needed this may involve acquisition of property or easements, provided the seller of the property is a willing seller.
- **BLM should work with neighboring property owners to develop access to sites that are respectful of private property** and the ability of private property owners in the area to enjoy their property while still allowing access. BLM may need to consider limiting the numbers of visitors and/or time areas are open to the public as a way to provide access while maintaining the rural, residential feel of neighboring properties.
- BLM should place, where appropriate, **signage** indicating parking areas, trails, whether bikes/strollers/horses are allowed, no fires, how to access site, private property (not the BLM sign – you are now leaving public lands – that doesn't help) and others and monitor to ensure visitors to the areas are abiding by these designations and rules. This may require obtaining designations by San Juan County that allow for fines or tickets for violations and development of a way to enforce the regulations. This may also require obtaining property or easements where established trails cross private property. BLM should ensure that there exists adequate infrastructure for frequently visited sites. This includes off road parking and toilets.
- BLM should establish **plans for trail use and location**. BLM should sign trails and ask visitors to remain on trails. Public education as to the impact of off trail use to destruction of habitat, cultural resources etc may be helpful.

### Approach to cultural resources:

- In working with the tribes associated with the resource, the identification and preservation of cultural resources so they can be honored by the tribe and also provide education and interpretation to the public is encouraged. The secrecy approach to cultural resources allows for destruction or denigration because the public is simply not aware of the resource. Educational information, including signage, can add quality to the lands in the national monument. Visitors can enjoy the natural beauty but also become aware of importance of these lands to Native Americans, both in times before and currently.

**Approach to natural resource management:**

- BLM should ensure that transmission/utility lines, energy projects or similar **do not degrade the natural environment or diminish the experience of visitors to enjoy the natural state of monument lands**. This includes consideration of **noise impact** from Navy Whidbey flight operations and other military training conducted in the vicinity of national monument lands. This also includes consideration of the potential impact on monument lands and habitat due to **oil spills** or other items associated with increased tanker and cargo shipments in the vicinity of national monument lands.
- BLM should evaluate whether **restoration of particular natural areas** is desirable in the context of preserving/creating unique environments (such as coastal meadow areas rather than having the forest overtake the meadow). BLM should work with other property owners to develop a landscape plan for areas. BLM should work with the community and neighboring property owners in developing plans for such management.
- BLM should consider **fire management** in context of the landscape and not just the monument lands.

**Coordination with other agencies:**

- BLM should actively engage other government and non-profit property owners to develop an **overall plan for management, conservation and stewardship of lands** included in the national monument, national historic park, national wildlife refuge, state parks, state DNR sites, county parks, county road ends, local parks, preserves and other. **Sharing an overall vision of these lands along with sharing resources is important**. All the entities involved should consider why they manage the land and whether another entity is better suited to handle a particular parcel. This is especially true for national monument and national wildlife refuge sites, where a re-alignment based upon the values of a site and which agency is better suited to manage the site will produce more appropriate and efficient management.
- BLM should work with other agencies or entities to see **that lands which embody the values of the national monument are protected**.

**Approach to and coordination with the local communities:**

- BLM should actively engage the local communities in the management and stewardship of monument lands. This includes **giving the communities meaningful opportunities** to become aware of BLM's plans and the ability to comment on those plans. And this includes not just listening to but incorporating concerns and desires of the local community into BLM's plans and actions.

**Public Safety:**

- **BLM should consider public safety especially when developing trail plans, parking, fire management and hunting activities**. This consideration needs to take into account the impact on neighboring private property as 'spillover' exists. A hunter or hiker continues onto private property and is injured or causes damage. Vehicles parked along a roadside may prevent emergency vehicle access or simply regular access to private property. Effective signage may be helpful in preventing this. Trail placement may also be helpful in deterring visitors from trespassing on private property. BLM may need to work with the county on hunting regulations that ensure the safety of the public while on monument lands and the safety of adjoining property owners (and their livestock, pets, wildlife) until such a time as there exists smart bullets that recognize property lines.

**Long-range planning:**

- BLM should consider the **likelihood of increased visitation on monument sites**. What locals have known as beautiful places is now known to many others. More visitors will come to monument lands. This isn't necessarily a bad thing **if the sites are prepared to handle this increase**, if the visitors are well informed about the sites and the need to respect the habitat/cultural resources/private property, the increase in visitation may not degrade the values of the monument lands. These lands are not just for the benefit of locals, but the concerns of the local community should be considered by BLM and **BLM needs to be adequately prepared to handle the increased visitation**.

Respectfully submitted,

[REDACTED]

[REDACTED]

Lopez Island WA 98261



SanJuanIslandsNM, BLM\_OR <blm\_or\_sanjuanislandsnm@blm.gov>

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## FW: San Juan Island NM Scoping Comments

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Wed, Apr 1, 2015 at 2:40 PM

To: [REDACTED] sanjuanislandsnm@blm.gov

Cc: "deChadenedes, Marcia" <mdechade@blm.gov>, Lauren Pidot <lpidot@blm.gov>

[REDACTED]

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**Sent:** Wednesday, April 01, 2015 11:24 AM

**To:** [sanjuanislandnm@blm.gov](mailto:sanjuanislandnm@blm.gov)

**Cc:** 'deChadenedes, Marcia'; 'Lauren Pidot'

**Subject:** San Juan Island NM Scoping Comments

Here are some topics that should be addressed in the upcoming Management Plan for the San Juan Islands National Monument.

1) There are areas in the monument (e.g. Iceberg Point) where grassy meadow and rocky bald habitat is rapidly converting to conifer forest.

- a. How should the open areas be managed and restored?
- b. How should the public be informed/engaged around these activities to maximize understanding and support (and to minimize opposition which might delay action)?
- c. What size/extent of meadows, for example, should be the target? Size on the date the monument was designated? Extent as of European Contact? Minimal needed to manage/protect the resource? Maximum past extent?
- d. If planting is done, should a preference be made to locally collected seed? How do we define "local"?
- e. If the past meadow extent was due to native American cultural practices, should the extent be maintained by trying to replicate those practices or shall we use the most practical method to achieve the same landscape?

2) There are cultural sites (e.g. archaeological resources) in the monument that are not publicly documented, presumably to minimize damage to those resources.

- a. Is there a risk that resources will be inadvertently damaged because people do not know they are important? (e.g. someone letting their child build "sand castles" in a midden)
- b. Can we educate the public to, in some specific sites, understand the cultural importance of the sites via education and interpretation, so the public can help serve as "eyes on the ground" to protect those values?

3) We should develop baseline data, as part of our inventories, on the "dark skies" values of the monument as well as the "soundscape" that exists. These may become important as we manage values going forward. We should consider trying to manage toward protecting both of those sets of values.

4) Some sites in the monument are heavily used and/or seeing increasing usage. How can we best manage

that pressure in order to enable the recreational and educational visitation without putting the monument's resources at risk?

- a. Can we designate and maintain trail systems that support higher visitation while preventing damage outside of the designated trails?
- b. How should we address parking issues? Restroom needs? What local partnerships would be needed?
- c. Should we extend existing trail networks into new areas in order to more broadly distribute the visitation pressure?

5) Several of the monument sites are on larger islands but have no official/legal/open public access (e.g. possibly the tip of Cape Saint Mary on Lopez).

- a. If there are existing easements or other means to allow legal access to these, should we open that access?
- b. Should BLM, possibly in partnerships with other entities such as the Land Bank, pursue the creation of legal access where it doesn't currently exist?

6) Many monument sites have been de facto wildlife refuges, with the public assuming they were islands or rocks in the San Juan Islands National Wildlife Refuge.

- a. Should public access be excluded from those sites? Merely discouraged?
- b. Can BLM work with the USFWS to allow joint management of such sites, to minimize redundant staffing and efforts in the islands?
- c. Can BLM work with the USFWS jointly on USFWS properties with recreational values (e.g. Turn Island, Matia) to minimize redundant staffing and efforts in the islands and to better distribute visitation pressures?
- d. What if the sites have been used by neighboring property owners for visitation? Should we list them as off-limits or publicly accessible or is there some intermediate classification?
- e. Can we consider potential damage to intertidal resources when we look at the possibility of allowing boaters access to some of these sites?

7) The monument sites are part of a large collection of protected lands in the islands that are managed by many groups and agencies.

- a. Should the BLM work with other terrestrial management groups to consider and address landscape-wide visitation pressure, recreational resources, habitat resources, etc. in order to achieve the biggest protection, recreation, education and scientific benefits for the archipelago rather than just making trade-offs within the BLM sites?

8) The islands are home to numerous threatened species of plants and animals. Should we consider (re-)introducing species to monument lands in order to bolster populations even if there is no specific data showing that the species inhabited that site? E.g. Would we introduce an endangered plant to Patos Island because it is a rare example of appropriate habitat even though that species may not have inhabited Patos in the past?

9) What sorts of signage are appropriate throughout the monument sites?

- a. Pedestrian-management signage (e.g. to keep traffic on trails, keep traffic off of fragile lands)?
- b. Boat-oriented signage to show visitors where it is OK to land and where landing should be avoided?
- c. Interpretive signage to educate the public on the natural and cultural resources they are visiting? Should these be mainly at entry points or distributed where most effective educationally? Should the visual impact of the signage be minimized to preserve the visual



3/25/15

RECEIVED 3/21/15

ORGAS ISLAND

## S J I NATIONAL MONUMENT COMMENTS

THE SAN JUAN ISLANDS HAVE DEVELOPED UNUSUAL FLORA AND FAUNA IN RESPONSE TO A PROTECTED OFFSHORE CLIMATE. THE SMALL SIZE OF ROCKS AND ISLETS AND THEIR PROXIMITY TO DEEP WATERS THAT ABSORB HEAT AND COLD, WORK TO MODERATE TEMPERATURE EXTREMES.

THE LOW GLACIER-SCOURED TERRAIN AFFECTS DRAINAGE PATTERNS, WHILE LONG TRAVEL DISTANCES OVER WATER REDUCES COLONIZING BY MANY PLANTS AND ANIMALS. SOILS MAY BE DRY AND ROCKY OR WET AND MARSHY LONG INTO SUMMER. CLIMATE CHANGE, POLLUTION, INVASIVE SPECIES REPLACING NATIVE ONES, AND TRENDS OF HUMAN USE ALL MERIT STUDY.

A DENSE COLLECTION OF SPECIES IS FOUND IN THE MONUMENT LANDS AND WATERS THAT HAVE BECOME ADAPTED TO LOCAL RESOURCES. THESE ISLANDS SERVE AS A HOME AND REFUGE FOR MANY CREATURES THAT ARE DISAPPEARING ELSEWHERE. SOME HAVE DEVELOPED TRAITS THAT ARE NOT FOUND IN OTHER POPULATIONS, OR ARE FOUND ON THE MAINLAND ONLY A GREAT DISTANCE WHERE SIMILAR CONDITIONS ARE FOUND. THIS IS A CHANCE TO OBSERVE WILDLIFE IN ORIGINAL HABITATS THAT HAVE BEEN MINIMALLY ALTERED BY HUMAN PRESENCE.

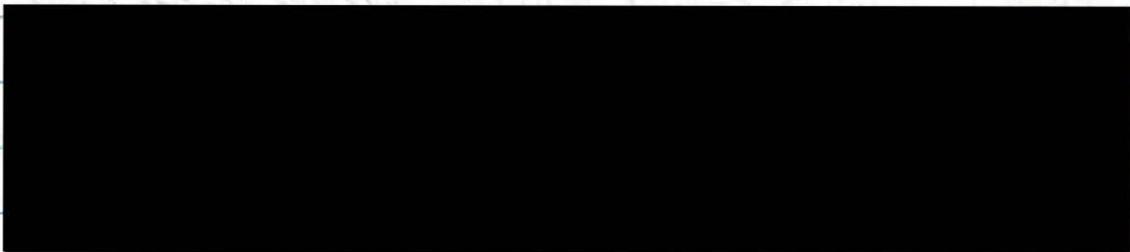
MANY ISLETS ARE TOO SMALL TO SUPPORT VIABLE POPULATIONS OF TERRESTRIAL ANIMALS FOUND ON LARGER ISLANDS. PAGES AND SMALLER ISLANDS HAVE NO DEER, RACOONS ETC. WE MAY COMPARE THE EFFECTS ANIMALS HAVE ON THEIR VEGETATIVE ALLIES IN OTHER PLACES, WITH HOW PLANTS GROW IN THE ABSENCE OF FORAGING ANIMALS.

AREAS WITH A SENSITIVE ECOLOGY SHOULD BE KEPT APART FROM HUMAN IMPACTS CAUSED BY OFF-TRAIL HIKING, CAMPING, BICYCLING, OR LANDING BOATS. STWARDSHIP ACTIVITIES SUCH AS CONTROL OF INVASIVES SHOULD BE PURSUED USING THE MANY VOLUNTEERS THE SAN →

... JUAN ISLANDS PRODUCE.

MONUMENT STAFF SHOULD ADVISE OTHER AGENCIES OF ENVIRONMENTAL HAZARDS THAT WOULD RESULT FROM OIL SPILLS. SURVIVAL CHANCES OF WILDLIFE IN THE MONUMENT AREA WOULD BE SERIOUSLY COMPROMISED.

THE ROCKS AND ISLAND THAT COMPRISE THE MONUMENT HAVE MANY MILES OF SHORELINE AND LITORAL ZONE HABITATS THAT DESERVE OUR PROTECTION.





SanJuanIslandsNM, BLM\_OR <blm\_or\_sanjuanislandsnm@blm.gov>

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## Scoping Comments

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Wed, Apr 1, 2015 at 12:23 PM

To: blm\_or\_sanjuanislandsnm@blm.gov

Hello BLM team,  
Thanks so much for all of the amazing work that you are doing for the National Monument!

Here are my comments for the process. Thank you!

Please use all means to protect the natural beauty, cultural and environmental aspects of the land.

Please maintain a balance of recreational impacts on the land by not over signing the areas so that the natural beauty of the landscapes are maintained and the land is not over-used by humans!

Please restore specific areas of the land that compliment the traditional uses of the Native Americans who lived here thousands of years prior.

Please continue to allow environmental education and scientific research on the land and perhaps designate areas specific for education and research over recreational use to maintain and protect the more sensitive areas of the National Monument lands.

Please utilize local scientists in your long-term plans for environmental education and scientific research, thereby maintaining relationships with local scientists and volunteers who are so passionate about the land and the community.

Thank you for listening and considering my comments!

[Redacted signature]



SanJuanIslandsNM, BLM\_OR &lt;blm\_or\_sanjuanislandsnm@blm.gov&gt;

## Scoping comments, San Juan Islands National Monument, re use of Kings Island

Wed, Apr 1, 2015 at 9:56 AM

To: sanjuanislandsnm@blm.gov

Friday Harbor, WA 98250

March 31, 2015

By email to [sanjuanislandsnm@blm.gov](mailto:sanjuanislandsnm@blm.gov)Re: Scoping Comments concerning Kings Island, San Juan Islands National Monument.

Dear Sir or Ms.:

I write with scoping comments concerning Kings Islands, a small island and a few adjacent rocks on the southwest side of San Juan Island, about a mile west of Pile Point.

1. **What issues about the BLM's management of the San Juan Islands National monument should be addressed through this plan?** I have set out below the issues which I believe BLM should address:
  - a. What uses by humans, if any, should be allowed on King Island?
  - b. More particularly, considering the importance of Kings Island as a perch for both bald eagles and golden eagles (of which there were three on Kings Island just this morning, two golden eagle and one bald); as a haul-out site for seals (including mother and baby seals); and as a breeding site for oystercatchers, for geese and (until a few years ago) for seagulls, is any use of King Island by humans appropriate?
  - c. Would camping on Kings Island be likely to have a material adverse impact on animal species, including seals that use it for a haul-out, bald eagles and golden eagles that use it as a hunting perch and as a spot to feed, and various bird species that breed there, including oystercatchers and geese and (at least until a few years ago) seagulls.
2. **What are some approaches to addressing these issues that the BLM should consider through the planning process?** I have set out below the approaches BLM should use to address those issues:
  - a. BLM should investigate whether anyone would be harmed by forbidding trespassing on Kings Island, by investigating who has trespassed on Kings Island in the past.
    - (i) Analysis: If BLM queries the landowners who live adjacent to Kings Island to see who has used it in the past, they will discover the following:
      - a. Use by any humans of Kings Island is rare.
      - b. No one (to the knowledge of the neighbors) has ever camped on Kings Island – although if BLM materials note that camping is allowed on it, one could

expect that kayak groups would begin to use it as a camping spot. None has done so to date, however.

c. Visits by well-intentioned canoeists (the same family, in a red canoe, who visited Kings Island in the spring nesting season year after year in the 1990s to show their children bird eggs) resulting in seagulls no longer nesting on Kings Island, but they did so previously. They also drove off oystercatchers from nesting, but I think one nesting pair of oystercatchers may have returned.

d. Kings Island is visited only rarely by kayakers, and never to date for overnight camping, and never for fires.

e. Conclusion: forbidding trespassing would not have a material adverse impact on anyone, since almost no one trespasses on the Island now.

b. BLM should investigate whether any animal species will be harmed if humans are allowed to trespass on Kings Island.

(ii) Analysis: if BLM investigates the animals which use Kings Island as a "safe harbor," it will determine the following:

a. Seals (including mother and baby seals) frequently use Kings Island and adjacent rocks for haul outs. Humans on Kings Island would scare them away.

b. Golden eagles and bald eagles use the top of Kings Island as a perch, both for fishing and for feeding on their catch. Humans on Kings Island would scare them away.

c. Kings Island is a nesting site for oystercatchers, and for geese. Until recently it was a nesting site for seagulls until humans (a single family who visited the Island each springtime in a red canoe to show their children the eggs in the nests) drove the seagulls away. I believe the same family also (unintentionally) drove off oystercatchers, but I think at least one nesting pair of oystercatchers has returned.

c. BLM should investigate whether the seagulls and oystercatchers which used to nest on Kings Island, but which were driven off by a single family which visited the Island each spring for a number of consecutive years, will return if humans are forbidden from trespassing on Kings Island.

d. BLM should investigate how to best fulfill its mission for the National Monument, which is "to preserve, protect and restore," considering (i) the absence of any regular use by humans of Kings Island in the past; (ii) the destructive impact of just one family of humans in the past of stopping nesting by seagulls and oystercatchers on Kings Island, and (iii) the current status of Kings Island as a safe haven for seals for haul outs, for geese and oystercatchers for nesting, and for bald eagles and golden eagles as feeding sites and hunting perches.

**3. What are other topics or concerns that you would like the BLM to address through the planning process?** I have set out below other topics or concerns BLM should consider:

a. Considering the close proximity of Kings Island to four neighboring landowners (it is joined by a tombolo to one property with a home, and is quite close to two other properties, each with a home, and also is close to a vacant lot), how can the neighboring landowners be protected if trespassing (especially camping) is allowed?

b. If humans are allowed on the (treeless) Kings Island, how will human waste be disposed of?

c. If humans are allowed on Kings Island, how will the Island be protected from degradation?

**4. Other thoughts or suggestions?** I have set out below my other suggestions:

a. Basically no one uses Kings Island now. The use likely will remain that way unless BLM

DEPARTMENT OF THE INTERIOR Mail - Scoping comments, San Juan Islands National Monument, re use of Kings Island publishes its availability for camping or for other human uses.

- b. Seals need it for a haul out spot. Mother and baby seals often are seen there together.
- c. Eagles (bald and golden) need it for a spot to feet and a spot from which to hunt.
- d. Birds need it for a nesting spot.
- e. I also join in the scoping comments submitted by my neighbor Mary Fern.

I'm happy to provide additional information if you would find that to be useful.

Very truly yours,

[Redacted signature]

[Redacted contact information]

[Redacted footer]

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SanJuanIslandsNM, BLM\_OR <blm\_or\_sanjuanislandsnm@blm.gov>

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## Scoping Comment for SJINM RMP

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[REDACTED]  
To: sanjuanislandsnm@blm.gov [REDACTED]

Hello,

I would like to see the DEIR address the following topics:

- In terms of Recreation: How do the newly designated National Monument sites relate to the Cascadia Marine trail, and how might opportunities for appropriate recreational water access be enhanced?
- Under Stewardship and Management: Given the wide variety of jurisdictions already managing public lands in the San Juans, what opportunities are there for synergy in the form of inter-agency agreements to enhance the efficiency and economy of managing lands in the National Monument?

Thank you,

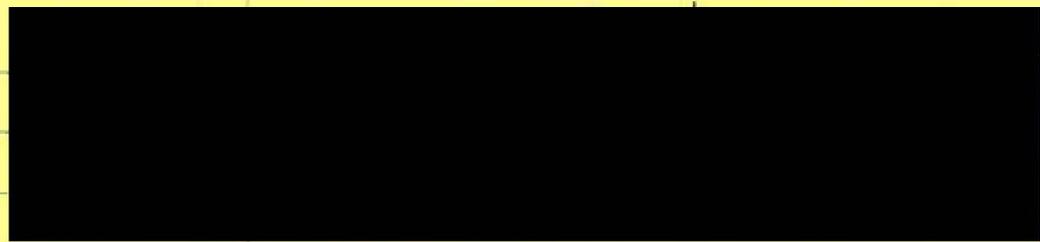
[REDACTED]

[REDACTED]

7/1/15  
MDC

# Scoping

pg. 1



7/1/15

I am writing this letter to the committee for a few passionate reasons. I guess I will start out from the beginning, when my family 1<sup>st</sup> moved ~~here~~ <sup>to Lake</sup> from Olympia WA. At that time I was 40 years old and my whole life from the time I can remember nature, Forest, creeks, rivers, <sup>lakes,</sup> oceans have been my "Go to place". Whenever I felt happy, sad to celebrate something important in my life time. Growing up Our family would go to the oceans and mts. Washington State was not as crowded then. You could find parking next to your hiking areas year round. And we also ~~lived~~ <sup>lived</sup> in the forest about 2 acres with the Des Moines Creek running through it. When I was about 10 yrs. old my father had to sell the wooded acreage to the Des Moines water people so they could put in a sewage treatment plant. I remember my father crying when the final papers were signed. It was our family home at that time and with 5 children College bound. ~~Eventually~~ my father did not feel we could afford to support all 5 of us and my mother loved the home. We still had my <sup>Lake</sup> ~~under~~ ~~grandfather's~~ house on ~~angle lake~~ ~~where~~ ~~there~~ were not many neighbors and jet boats & water skiing were few and far between, so we did spend time there and we all loved swimming in the lake. My Grandfather also had a house on Angle Lake where

Under <sup>Washington</sup> ~~grandfather's~~ house

we could camp outside and skinny dip at night and enjoy swimming across the lake due to no boats with engines only rowing boats or very small sailing vessels were allowed. My childhood was pretty blissful. So when we moved to Lopez Island at age 40 after living ~~living~~ in Seattle and the suburbs, of Kansas City and Olympia suburbs. You can only imagine the Joy I felt and how it felt like a coming home to me. And so exciting to share with my children and husband. Lopez Island. We were fortunate enough to buy an old house on Hughes Bay from the owner. And we promised to only change the house on the inside and that we would not tear it down. It's so devastating to the wildlife when big construction projects happen so we kept our word.

I had been living on Lopez when I went on my 1st night walk with a lady friend. I could not believe it we were going walking at night (you get picture city life, suburbs - not safe). Yep it's beautiful Susan you will not believe it. So we walked out at Point Colville and planned the fund raiser "Harvest home" very quietly we spoke. The Tide coming in, Owls hooting and the beautiful stars were out with a new moon it was breath taking and SAFE as long as you dressed for the weather and had not 1 but 2 Flashlights one for backup. Flashings with the color red that is all you needed.

Pg. 3

After that walk at night I realized what a safe, loving community that we lived in and how important it was to be able to sit in Nature not just during the day time, but evenings also. In 2006 I was diagnosed with stage 3 breast cancer. I had a few surgeries and chemotherapy and during that year and 1/2 I would pack up soup, tea, blankets, Flashlights and I would walk Teaberg at day time and Colville usually at night. I spent a lot of time praying and meditating quietly in those 2 spots, they were my church. I healed and went into remission for 6 years. I went back to being a Sea Kayak guide 6 months out of the year. So again my time was ~~at night~~ to walk was at night after dinner. Meditation time for a relaxing night sleep. My husband also works very long and stressful times. So if he wanted to walk during the week it was also the evening time.

3

My cancer came back in 2014. Total surprise to everyone and my Drs. It came back into my body and attacked 80% of my bones. I was lucky the cancer had not gone into my organs. Now my walks were much shorter, and usually day time unless someone was with me. Most of my friends work so we can only walk at night. So again having the parks open at night has been important. I've been having chemotherapy and only ~~one~~ 1 surgery on my neck and throat this time. My doctor

never thought I would live past 2 years. It has been 2 years and 3 months now. Of course I have been a good patient taken chemotherapy for 2 1/2 years. Has helped me heal! But the quiet, silence, beauty and meditation at these sacred parks and sites I know have played a big part in keeping my fear level down and away. Nature is an amazing part of our genetics and makes up joy in ~~my~~ my brain. and I am sure in many others. I am almost in remission and probably will be by the end of April. My Doctors are in shock and my family to. I am somewhat but I really love life and living on Lopez. And having these beautiful parks that I can walk at any hour of the day has played both magic and given me the freedom to help heal my cancer. I really hope that there will be no curfew put on these beautiful parks. I can think that rules can be posted such as Do you have a flashlight? probably 2 Are you dressed warm enough Please stay on trail. Long trails you might want to bring a snack. What you pack in, please pack out. No bike riding. Please these are silent walks only at night. Use only red light. Just an idea but I think it could work. I also don't feel we should make more parking available because then the parks will get over crowded.

Growlers: I have written letters in the past and again I will voice my opinion on the same subject. Its the noise we all know how a sudden wakeup during the night to a ~~big~~<sup>large</sup> and scary noise creates your nervous system to go on alert and after so many of these happening I'm sure that it can cause illness. Air pollution of course causes asthma and bad things grow on our plants and vegetables. I really wish you could find another place in the world that would want the navy business and not mind the noise of the growlers. People that live on islands work hard in their daily lives and even miss being close to loved ones etc. But we do it to live in a beautiful quiet place. Can you please take the growlers somewhere else and when you do make sure the people in that environment want them. And I really wish we could cut down on the sound and not have so many practices. it just seems so costly and over rated. Is it because the <sup>pilots</sup> people are required to be paid for so many practices and if you cut their numbers of practices down, would less people want to fly growlers? It just has to be economic driven in some capacity. For anyone to want that job.

Thankyou for listening