



Friends *of the* San Juans

360.378.2319
www.sanjuans.org

P.O. Box 1344
Friday Harbor, WA 98250

December 21, 2018

Marcia deChadenedes
Monument Manager
San Juan Islands National Monument
Lopez Island BLM Office
PO Box 3
Lopez, WA 98261

Re: Comments on the San Juan Island National Monument Draft Resource Management Plan/Environmental Impact Statement

Dear Ms. deChadenedes:

Thank you for providing this opportunity to comment on the draft environmental impact statement (DEIS) for San Juan Island National Monument (Monument) resource management plan. We appreciate the efforts by local Bureau of Land Management (BLM) staff to make this a transparent and participatory process and the public outreach offered by your staff.

The Friends of the San Juans (Friends) wishes to have following comments entered into the official DEIS record and we hope that BLM staff will incorporate these comments into the adopted resource management plan. Since 1979, Friends has worked to protect and recover the 113 endangered species in the Salish Sea, with the most iconic being the Southern Resident Killer Whales. Friends works with diverse stakeholders, including citizens, tribal and non-tribal governmental agencies, as well as with other non-profit organizations in the transboundary waters of the Salish Sea. Our 2000 members live, work and recreate in the San Juan Islands. Our mission is to protect and restore the San Juan Islands and the Salish Sea for people and nature.

In reading the DEIS, it is apparent that BLM staff have spent a lot of time crafting a well-balanced document that identifies a wide range of options for addressing most of the major issues for Monument management. Following Friends' general comments in this letter on future management of the Monument is a table laying out specific comments and suggested edits on the DEIS as well as references for some of those comments.

Friends is concerned that BLM and Department of Interior administrators have not more fully supported the Monument Advisory Committee, composed of local citizens. Local, public interest in Monument lands has been instrumental in protecting the unique and irreplaceable resources of BLM lands in the San Juan Islands since the initial designation of the Areas of Critical Environmental Concern in 1990 to the establishment of the Monument through Presidential Proclamation 8947 in 2013. Including local knowledge, expertise and input into the

crafting and implementation of the resource management plan is essential to developing a successful and realistic plan with strong community support. Although late in the process for developing the Monument's resource management plan, we respectfully request that BLM reconvene and fully support the Monument Advisory Committee in finalizing the environmental impact statement and management plan as well as being able to provide meaningful, local input into future Monument management.

To ensure that the resources and values for which the Monument was established and the successful implementation of the adopted resource management plan, we also ask that the Monument be adequately funded and staffed by BLM. Sustained financial and logistical support from BLM for implementation and enforcement of the adopted management plan is essential to maintaining the character of Monument lands and meeting the purpose and intent of Presidential Proclamation 8947.

In terms of Monument land ownership and disposition, we recommend that no additional right-of-way access be allowed except for U.S. Coast Guard and emergency response equipment and personnel for medical, law-enforcement, homeland security and fire-fighting purposes. Also, that the BLM only exchange lands that further the protective purposes of Presidential Proclamation 8947. Collection of natural materials within the Monument (commercial and non-commercial) should be prohibited except for permitted scientific studies.

One important element of Monument management that has not been adequately addressed in the DEIS is oil spill prevention and response capacity. We recommend that a more detailed discussion of how BLM will respond to spills within the Monument be included in the final environmental statement and adopted management plan. The oil spill response plan should include specific directions for how BLM staff will react to a spill and what resources BLM can commit to a response on their lands as well as how BLM will coordinate with other agencies and responders regarding both spill response and spill prevention.

Friends' concurs the goals of the DEIS relative to the protection of cultural and historic resources and ecological restoration. Due to the strong emphasis on increasing recreation on Monument lands (except for Alternative A), we do not support any of the proposed alternatives.

We do not support the prohibition on recreation proposed in Alternative A as many of the sites within the Monument have been used for recreation for decades by local residents and the public. Being able to access and enjoy the larger properties in the Monument (not including the marine rocks and smaller islets) is an integral part of what makes the San Juan Islands such a special place; the public should have the right to enjoy and experience these public lands.

However, to ensure the long-term integrity of sensitive sites and resources for which the Monument was established, we believe there needs to be explicit standards and limitations on some forms of recreation (e.g., hunting and dispersed camping) within the management plan

and Friends recommends retaining the Areas of Critical Environmental Concern (ACEC) on currently designated lands and expanding that designation to the remainder of the Monument outside of currently developed areas such as designated campsites and maritime heritage areas. Therefore, due to the risk to Monument resources and potential changes to the unspoiled character of many Monument sites, we do not support the increased recreational opportunities proposed in Alternative D; the trail network should not be expanded nor should increased equestrian and mountain bike use and dispersed camping be allowed. Camping should be maintained and encouraged only at currently designated campsites.

Cultural Resources tribal treaty rights

Protection of cultural resources, particularly sites important to Coast Salish peoples, is paramount and is one of the principal reasons for Monument establishment. The DEIS is very forthright in honoring tribal interests and treaty rights and placing a strong emphasis on consultation with tribes in developing the management plan. To ensure the integrity of known and undiscovered cultural sites and artifacts, we recommend that trails and camping be limited to designated sites and that interpretive signage be installed to explain the value and sensitivity (cultural and ecological) of these sites and why it is important that people stay on established trails. Encouraging increased recreation and more intensive activities such as mountain biking and horseback riding would endanger some of these culturally sensitive sites and does not appear to be consistent with Presidential Proclamation 8947 that established the Monument.

Friends fully supports BLM's open approach to working collaboratively with local Native American tribes to co-manage Monument lands for culturally significant resources, including plants. Vegetation management to re-establish meadows and shrublands more compatible with culturally significant habitats and species such as camas should be a priority in the management plan and done in consultation with local Tribal governments. While fire may have a role in restoring meadows to a more historic condition, given the concerns about the effectiveness of fire as a restoration approach raised by Kwiaht (December 1, 2018 comment letter), we believe additional study on the efficacy of fire in successful restoration within the San Juan Islands is needed before proceeding with large-scale use of fire. Due to the risk of damage to cultural resources and local ecology, we believe use of mechanized vegetation management should be limited to timber harvest using horse-drawn and/or rubber-tired machinery and only after thorough cultural resource surveys of treatment areas.

Where necessary to protect cultural and paleontological resources along the shoreline, soft armoring should be the method of choice unless a site evaluation by a licensed geologist and consultation with tribes determines that only hard armoring will protect the at-risk cultural resources. When possible, we recommend that tribal representatives be present at the time of armor installation to ensure the full protection and honoring of cultural resources. Hard shoreline armoring should not be used in areas with wilderness characteristics. And except to protect cultural and paleontological resources along the shoreline, armoring should be

prohibited within the Monument. Co management with tribes should also occur regarding the long term management of cultural resources, as climate change impacts such as sea level rise may limit the success of fortification efforts.

Habitats and Plants

More active vegetation management within larger Monument sites such as Cattle Point and Iceberg Point would benefit the local ecology, special status species and potentially reduce the risk of catastrophic fire; all goals of vegetation management within action Alternatives C-D. Friends supports the target goal of restoring 40 – 50 percent of Monument lands to shrubland and meadow, which would achieve many of the stated management objectives. Without more active management, forest and woodland, as well as non-native species, will continue to encroach on other, culturally significant and unique habitats. To be most effective, BLM staff should have a variety of proven management tools available to them, including prescribed fire (in settings where it has been demonstrated to be effective in the San Juan Islands) and selective, limited use of herbicides (painting and spot hand application only versus broadcast spraying) for non-native species. Due to their broad spectrum effects and potential risk to non-target, beneficial species, Friends does not support the use of biocides or pesticides. To protect against catastrophic fires that may alter soil chemistry and structure as well as pose a safety risk, we recommend that where prescribed fire will be used, it should only be limited to sites where the woody overstory has already been removed. This will help ensure that the prescribed burn is a low-intensity fire that moves quickly through the site and preserves soil and seedbank integrity. Until thorough cultural and ecological surveys have been completed on prospective treatment sites, we do not support mechanized clearing as a treatment tool. Hand clearing of shrubs and trees should be the method of choice for tree and shrub removal with the cleared vegetation returned to the site as biochar or mulch to improve soil tilth. We strongly favor efforts and opportunities on Monument lands to restore habitat for special status as well as culturally important species and communities. Where site conditions are favorable, Monument lands have the potential to be an important resource for re-establishing special status species such as golden paintbrush (*Castilleja levisecta*) and the island marble butterfly (*Euchloe ausonides insulanus*) as well as restoring a diminishing landscape to a historic condition. To maintain ecological integrity and resiliency, we believe that plant collecting should be limited to tribal members and permitted scientific collection as long as collection does not harm the plant community/species population. Commercial collection of any kind should be prohibited within the Monument.

In terms of wetland management, there is an incorrect premise in the DEIS that Sitka spruce (*Picea sitchensis*) is an upland species that is decreasing the functions of the Point Colville wetland and should be eliminated (DEIS, pp. 83 and 109). Sitka spruce is one of two Pacific Northwest native conifers, the other being western red cedar (*Thuja plicata*) that can tolerate enough soil moisture to be considered a wetland species (see National Wetland Plant List available at: http://wetland-plants.usace.army.mil/nwpl_static/v33/home/home.html). While true that transition to a forested wetland could make the site drier, forested wetlands are generally considered to be relatively high value (Sheldon 2005, Hruby 2014). To determine

whether or not the expansion of Sitka spruce into the Point Colville is degrading or enhancing (increasing habitat structure and diversity) wetland functions, an assessment will depend on what species and functions the spruce is displacing and what BLM considers to be desirable conditions/functions for this wetland. Because of the risks of inadvertently draining wetlands by compromising occlusive soil layers through excavation, we recommend that excavation not be used to increase wetland area. Impoundment may be a more reliable means of increasing wetland area while minimizing disturbance to the existing wetland.

Recreation and Access

Allowing and supporting thoughtful public access of Monument lands should be a goal of the management plan. That being said, there are some sites in the Monument that simply are too sensitive and valuable to withstand unrestricted access; limiting where people can go and the activities they take part in is in the best interest of the long-term sustainability of the Monument. To preserve the legacy of early settlement and the area's long maritime history, existing structures in maritime heritage areas should be restored and/or rehabilitated to their historic appearance. Interpretive signage and limited visitor facilities at some of these sites (e.g., Cattle Point, Turn Point) would make these sites more accessible and enhance visitors' experience.

Camping, with limited party sizes to no more than 10 people, should be allowed only in designated campsites, including those associated with the Cascadia Marine Trail (e.g., Blind and Posey islands). To protect wildlife and the fragile ecology of rocks and islets, non-motorized recreational boat landings should be restricted to sites where it is safe and practical and is consistent with other regulations and agency standards. Except for Trinka Rock, most of the Category A and B rocks within the Monument should be reserved for wildlife and their ecological value and not open to recreational boating access. Where access by recreational boats is allowed on the smaller islets, BLM should coordinate seasonal closures with the Washington Department of Fish and Wildlife and the U.S. Fish and Wildlife Service to protect nesting seabirds and marine mammals.

Hiking, biking and horseback riding should be limited to those areas where those activities are already allowed and restricted to established trails. With perhaps the exception of Chadwick Hill, given the relatively small size of most Monument sites, there simply isn't enough space for new biking and horseback riding trails without causing irreparable harm to the local ecology, cultural sites and existing hiking trails. New interpretive signs and educational exhibits should be sited to avoid areas of high ecological or cultural sensitivity¹.

Again, due to the relatively small size of Monument sites and safety concerns, hunting should be limited to shotgun, black powder weapons and archery only at the larger sites. Allowing the use of modern rifles on Monument lands poses a significant safety risk to adjoining home owners and residents, as well as non-hunters and Monument staff who may be onsite. Hunting

¹ Wetland buffers should be consistent with best available science and agency guidance, based on the wetland category (see Granger 2005 and Hruby 2013).

should be expressly prohibited on the Category A and B rocks and islands listed in Appendix O as well as any other sites where it does not currently occur. BLM should coordinate with the Washington Department of Fish and Wildlife and local tribes on weapons restrictions and hunting seasons.

To preserve the relatively unspoiled character of the Monument lands, recreational drone use should be prohibited within the Monument.

Consistency with other Federal Land Management of Islands in the San Juan Archipelago

The rocks, reefs and islands of the San Juan Islands National Wildlife Refuge (Refuge) were set aside in 1960 to provide important habitat for migratory birds and other wildlife. Black oystercatchers, Brandt's cormorants, rhinoceros auklets, and pigeon guillemots are among the bird species that nest on Refuge islands. Harbor and elephant seals regularly use the shorelines to rest, molt and give birth to pups. Additionally, the untrammeled islands are home several rare plants including brittle prickly-pear cactus, bear's foot sanicle, and California buttercup.

Select opportunities to explore the Refuge islands may be found by foot, boat, and car. Most of the Refuge consists of small, wilderness islands whose fragile habitats are closed to human activities, enforced by a 200 yard off-shore buffer zone. This 200 yard off-shore buffer zone should be consistently applied to islands within the National Monument to avoid confusion and to offer the greatest protection to wildlife unless specifically authorized for public use. Two Refuge islands, Turn and Matia, have overnight campgrounds operated by Washington State Parks and short hiking trails for adventurous visitors.

Thank you again for providing an opportunity to take part in this important work. We look forward to continuing to work with BLM staff in finalizing the management plan. Friends is dedicated to protecting and restoring the San Juan Islands and we very much appreciate the time and effort that BLM staff have devoted to developing the management plan and protecting Monument lands. Please let us know if you have questions about any of our comments or if we can be of any further assistance to BLM staff.

Sincerely,



Stephanie Buffum
Executive Director

Specific DEIS comments with citations

Citation	Text	Comment
page 13, line 25; Alt. B; Shoreline Erosion	Allow both soft and hard shoreline stabilization...	Hard shoreline stabilization should be used in consultation with tribes only where a geotechnical analysis determines that soft methods are infeasible. If hard stabilization is used on known or potential forage fish spawning beaches, compensatory mitigation (1:1) for the stabilization footprint shall be provided within the same watershed. Same comment for Alt. D.
page 13, line 38; Alt. B; MHA Direction	... using manual, mechanical, chemical, or biological vegetation treatments.	Herbicide use should be limited to hand-application whenever possible; broadcast chemical treatment should not be applied within 200 feet of a water or wetland or if at an aquatic site, only by an applicator licensed for aquatic herbicide use. Due to the risk to non-target, beneficial species, biocides and pesticides should not be used.
page 89, line 27; Cumulative Effects; Forest and Woodland	One exception is vegetation management the San Juan County Land Bank is undertaking to restore Garry oak woodland and savanna on approximately 25 acres on Orcas and San Juan islands (Habbeger 2017)	Habbeger not listed in references.
page 105, Table 15 footnote; Wetlands	⁴¹ ... The BLM specialist identified 25 feet as an appropriate buffer within to measure direct impacts to wetlands. See Appendix B for more information.	For analyzing potential impacts, 25 feet may be an appropriate buffer distance but for wetland protection and consistency with wetland regulation, buffer widths should be based on wetland functions (see WDOE et al. 2006; hereafter, Mitigation Guidance).
page 107, lines 27- 32; Alt. B; Wetlands	Approximately 30 acres of the Monument that are currently classified as forest and woodland would be modified	What is the purpose of wetland creation? Due to potential risk to nearshore species, recommend that herbicides not be used within

	to support wetland characteristics, bringing the Monument’s total wetland acres to approximately 75. Treated acres would enlarge existing wetlands. To accomplish this objective, the BLM is likely to undertake treatments including herbicide application and planting of native wetland plugs.	wetlands/waters draining to marine waters. To use herbicides within wetlands, applicator will need to be licensed for use of aquatic herbicides.
page 108, lines 32-33, 35-36; Alt. C; Wetlands	Under Alternative C, 0.1 miles of trail within 25 feet of a wetland and 0.5 miles of trail within 150 feet of a wetland would continue to be open to equestrian use... Equestrian trail use may produce more sediment than other trail uses...	A 25-foot buffer is inadequate to protect water quality (see Mitigation Guidance and also Hruby 2013. While true that equestrian trail use may (will) produce more sediment, there is no mention of fecal contamination from horses.
page 109, lines 2-3; Conclusion; Wetlands lines 11-12	Approximately 20 percent of the wetland resources in the San Juan Islands have been classified as potentially disturbed (<u>WDOE 2011b</u>). Development of wetlands is regulated by the Clean Water Act and State regulations including the <u>Joint Aquatic Resources Permit Application</u> .	Don’t find WDOE 2011b listed in References. JARPA is simply the application, not a regulation (State regulation through Water Pollution Control Act [RCW 90.48] and Shoreline Management Act [RCW 90.48]).
page 251, lines 1-2; Wildlife	Harbor seals are the most abundant marine mammal encountered in the area, but California and <u>Stellar</u> sea lions...	Steller sea lions; named for Georg Wilhelm Steller.
p. 304; l. 15; Appendix B; Analytical Methods; Wetlands	Wetlands are defined following USACE (2016) and Cowardin (1979).	USACE (2016) and Cowardin (1979) not found in references; recommend replacing Cowardin (1979) with FGDC (2013), which is the updated, 2 nd

		edition of the 1979 Cowardin et al. report.
--	--	---

References

FGDC (Federal Geographic Data Committee). 2013. *Classification of wetlands and deepwater habitats of the United States*. FGDC-STD-004-2013. Second Edition. Wetlands Subcommittee,

Federal Geographic Data Committee and U.S. Fish and Wildlife Service, Washington, DC.

Granger, T., T. Hruby, A. McMillan, D. Peters, J. Rubey, D. Sheldon, S. Stanley, E. Stockdale. April 2005. *Wetlands in Washington State - Volume 2: Guidance for Protecting and Managing Wetlands*. Washington State Department of Ecology. Publication #05-06-008. Olympia, WA.

Hruby, T. 2013. *Update on Wetland Buffers: The State of the Science, Final Report*, October 2013. Washington State Department of Ecology Publication #13-06-11.

Kwiaht. December 1, 2018. *General Comments on San Juan Islands National Monument draft RMP/EIS*.

Sheldon, D., T. Hruby, P. Johnson, K. Harper, A. McMillan, T. Granger, S. Stanley, and E.

Stockdale. March 2005. *Wetlands in Washington State - Volume 1: A Synthesis of the Science*.

Washington State Department of Ecology. Publication #05-06-006. Olympia, WA.

WDOE (Washington State Department of Ecology), U.S. Army Corps of Engineers Seattle District, and U.S. Environmental Protection Agency Region 10. 2006. *Wetland Mitigation in Washington State – Part 1: Agency Policies and Guidance (Version 1)*. Washington State Department of Ecology Publication #06-06-011a)