

Comment to the NAVY EIS for EA-18G Growler, Airfield Operation

Deadline for submission: Friday, January 9, 2015, info at <http://whidbeyeis.com/>

Contributing information and questions for consideration to the EIS design.

The San Juan Islands National Monument was designated by Presidential Proclamation in March 2013. This designation tasks the Bureau of Land Management (BLM) with managing the approximately 1000 acres of public land to protect, conserve, and restore the resources identified in the designating language, including the Coast Salish history, post-settlement histories (especially Turn Point and Patos Island Light Stations), and the outstanding natural setting and wildlife. In San Juan County, the Monument represents 3% of the land in conservation status. Of the 111,360 acres of land in the county, approximately one third (36,000 acres) are protected by federal, state, county, or nonprofit status, and private/public easements. Additionally, the county has designated a marine protected area for the region which prohibits jet skis, and is the only county in the USA with a Leave No Trace resolution in their management plan.

Though outstanding natural settings are a desired status, this is not purely with altruistic intent. Though there are less than 16,000 islanders, visitation to the islands hovers at around 1,000,000 annually. The natural and cultural heritage, and quiet recreation (sailing, whale watching, hiking, kayaking, agritourism, bicycling) are the economic base for the region. The stewardship for the islands, extended through the tourism experience, is international, and additionally includes Coast Salish and Skallam Nations.

The BLM lands on the south end of Lopez Island were designated Point Colville and Iceberg Point Areas of Critical Environmental Concern prior to monument designation. The management plan for this designation is the most restrictive that exists for public lands, similar to stipulations for Wilderness Areas. There is no mechanized or motorized recreational use, no fires or camping are allowed, nor groups of more than ten without a special permit. All decisions for the landscape are made in consultation with seven Native American Tribes. Adjacent to BLM managed lands on Lopez Island are designated U.S. Fish & Wildlife Service Wilderness Areas, county parks, nonprofit lands, and privately owned lands all with the formal designations for conservation. In keeping with former Secretary Salazar's 2011 directive for the Department of the Interior agencies in the San Juan Islands to be managing more efficiently and collaboratively, and supporting community direction, this region has become a demonstration for multi-level management.

The BLM appreciates that the Navy has broadened the analysis area to include the San Juan Islands, as the island residents have been documenting disturbance from the sound of the EA-186 Growlers. The website managed by the county to document disturbance locates the greatest degree of noise at the south end of Lopez Island, where bald eagles and peregrine falcons nest in the 400 acres of BLM Areas of Critical Environmental Concern. The Environmental Impact Statement needs to address potential disturbance to the birds and other wildlife, due to the increased frequency of overflights, and any inter-

lated impacts to the eight state listed plant species in the affected areas. In a separate document the BLM will provide all inventory data and pertinent information for the wildlife, as well as offer references to further sources of information to assist in establishing a baseline for analysis of impacts.

For these reasons, we request that the impact analysis address and disclose the impacts to Monument resources, as well as interrelated resources on the islands' other conservation lands, and on the socio-economic value of those lands and resources within the region.

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