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January 3, 2019

RE: San Juan Islands National Monument Draft Resource Management Plan and Environmental Impact Statement

To whom it may concern:

Thank you for taking the time to consider our comment on the San Juan Islands National Monument Draft Resource Management Plan/Environmental Impact Statement.

RE Sources for Sustainable Communities is a local organization in northwest Washington, founded in 1982. RE Sources works to build sustainable communities and protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our North Sound Baykeeper program is dedicated to protecting and enhancing the marine and nearshore habitats of northern Puget Sound and the Georgia Strait. Our chief focus is on preventing pollution from entering the North Sound and Strait, while helping our local citizenry better understand the complex connections between prosperity, society, environmental health, and individual wellbeing. Our North Sound Baykeeper is the 43rd member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has over 20,000 members in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

The San Juan Islands National Monument is important culturally, historically, and ecologically to all residents of the Salish Sea, but especially the Coast Salish people. The creation of the San Juan Islands National Monument is a timely and unique opportunity to show our solidarity with the Coast Salish communities. While the Coast Salish people have been inhabiting these islands for more than 10,000 years there is little overt evidence of their existence on these lands. Their presence has been wiped from the landscape. Now is the time to reconcile this and create a monument that preserves and educates the public about the ecological wonders found in the Monument and pays tribute to the Coast Salish communities. This entails showing respect to their traditional way of living by restoring and preserving the land to pre-Euro-American conditions and providing educational opportunities to enlighten the public



about their historical and contemporary culture. The alternatives that best represent these ideals are listed below with clarifications, additions, and rationals.

CULTURAL RESOURCES: Sub-alternative C

The Coast Salish community should be formally involved in the process of protecting and enhancing the historical and cultural resources in the Monument. Any new structures built in the Monument should be built in the Coast Salish architecture style and should be used for cultural or educational purposes. Hard shoreline armoring should not be used *unless* soft shoreline armoring is not effective at saving cultural sites.

EDUCATION AND INTERPRETATION: Alternatives C and D

Signs should be installed throughout the Monument to provide education and interpretive messages particularly as it concerns to protecting sensitive areas and informing visitors of Coast Salish Culture. Signs should be used to discuss Coast Salish traditions - historic and contemporary, historic land uses and manipulation, language, and varying perspectives. Signs could be embedded with Salishan language and artwork and also discuss the concept of ceded and unceded territory. The Monument could also provide education opportunities beyond signage in the form of workshops or education programs for Monument visitors along with cultural sensitivity training for Monument staff.

HABITAT AND PLANTS: Sub-Alternative C

Reestablishing the plant communities that existed prior to Euro-American settlement of the San Juans is another valuable way in which the Coast Salish people can restore some of their historical and cultural traditions. This will allow tribes to restore food sovereignty across the landscape. Ecosystems such as native grasslands and shrublands are already scarce and will likely vanish unless proactive measures are taken. Also, to protect water quality it is best to avoid the use of chemical treatments.

LANDS AND REALTY: Alternative C

To further protect the Monument, rights-of-way across the Monument should be prohibited except as listed and it should be designated as a right-of-way exclusion area.

Note: page 41 line 14 should this read "(same as **B** and D)"?

NATURAL MATERIAL COLLECTION: Alternative C

Given the high volume of visitors to the Monument, non-scientific collection of natural materials should be prohibited except for Coast Salish tribes' spiritual or traditional use. This prohibition should be included in the signage.

PALEONTOLOGY: Alternative C

To ensure that the Coast Salish voice is included, tribes should be consulted when identifying, inventorying, and protecting paleontological sites especially those that are sacred. Hard shoreline armoring should be prohibited *unless* soft shoreline armoring is not effective at protecting paleontological resources.

RECREATION AND VISITOR SERVICES: Alternative B (see attached sheets for specific RMA input)

The Monument should prioritize restoration, preservation, education, and scientific study over recreation; visitor impacts should be minimized. This means bikes, horses, and motorized vehicles should be restricted to existing roads. A select amount of hiking trails that do not compromise the cultural and biological integrity of the area should be maintained as presented in Alternative C. Furthermore, extraneous trails that travel through culturally and biologically sensitive areas should be decommissioned. Methods such as signage and fencing should be employed to keep people on trails. Drones except for those used by agency officials to evaluate the health of the Monument should be prohibited along with motorized water vehicles.

TRAVEL AND TRANSPORTATION: Alternative C

In the spirit of focusing on cultural and biological preservation and education, the amount of road for public motorized access should be minimized and only a minimal trail network should remain and be maintained for hiking only (no bikes or horses).

VISUAL RESOURCES MANAGEMENT: Alternative C

This alternative will provide the most protection for ecological and cultural resources.

WILDERNESS CHARACTERISTICS: Alternative C

This alternative will provide the most protection for ecological and cultural resources.

WILDFIRE RESPONSE: Alternatives B, C, and D

WILDLIFE AND FISH: Alternatives B, C, and D

This is another opportunity to collaborate with the Coast Salish communities to work in managing fish and wildlife of ecological and cultural value. Coast Salish communities have used the land and waters to harvest food for generations. Consulting with them will help ensure that they can continue (or return) to harvesting in their traditional ways.

OIL SPILL RESPONSE:

A matter of great concern regarding protection of the San Juan National Monument is frequent oil tanker transits through straits around the archipelago, which presents the perpetual risk of a catastrophic oil spill. Responsibility for oil spill prevention and response involves transboundary coordination through numerous agencies. The final environmental statement and adopted management plan should specifically address how BLM will respond to a spill scenario impacting the monument.

To ensure the voices of the Coast Salish communities are heard, we encourage you to not only collaborate with the Coast Salish throughout the entire development of this monument but to incorporate Coast Salish people into leadership roles from beginning to end. This will ensure that the Monument truly embodies the Coast Salish culture.

We hope that you consider to manage this Monument from both an ecological and a cultural standpoint. This draft Resource Management Plan and Environmental Impact Statement is a wonderful opportunity to better uphold the cultural and historical significance to the Coast Salish peoples and share these educational opportunities with the public. This plan is important to strike a best balance between recreational use and preservation so that the public can learn why San Juan Islands National Monument

is worth protecting and enjoy these special and unique lands without compromising the integrity of its cultural or ecological values and resources.

Thank you for your time and consideration in hearing our thoughts and concerns.

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