

**San Juan Islands Monument Advisory Committee
Meeting
September 24, 2019**

Location: Lopez Community Center, Lopez Island, WA

Time: 10:30 am – 1:45 pm

MAC Present: Rhea Milller, Tom Reynolds, Tracey Cottingham, Erin Corra, Shirley Williams, Jackie Ferry, Jamie Stephens, Leslie MacDonald, Mike Jonas, Gene Helfman (via phone)

BLM Present: Jessica Montcalm, Skeet Townley, Nick Teague, Michelle Brown (via phone) Lauren Pidot (via phone)

Public: over 15 local Lopez residents in the audience

Call to Order and Welcome:

- Rhea Miller, MAC Chair, opened the meeting and called the meeting to order with introductions around the table to include those on the phone and BLM staff present in the room
- Michelle Brown, Acting Spokane District Manager welcomed everyone and thanked everyone for their dedication and participation in this process

Adjustments to existing agenda:

- Chair asked for any adjustments needed to be made to the existing agenda:
 - Chair asked to introduce to the MAC 3 letters to consider and officially endorse
 - Chair read aloud the Letter written by Congressman Rick Larsen to DOI Secretary and BLM Director
 - Main focus of letter was referring to dispersed camping, lack of capacity, emergency response needed, wildfire concerns and requesting BLM does not add any dispersed camping (with or without a permit) into the Proposed RMP.
 - Chair Proposed a Resolution: Asking MAC to endorse this letter and add that this letter on no way supersedes Tribes from their Treaty Rights
 - Motion made by Mike Jonas
 - Seconded by Tom Reynolds
 - MAC Voted unanimously in favor of endorsing this letter
 - Special note was asked to be made in the meeting minutes that no one on the MAC had seen or known about dispersed camping being in the proposed RMP.
 - Chair read aloud the Letter written by San Juan County Council and County Staff to BLM Spokane District Manager
 - Main focus of letter was referring to MAC's role in RMP Process and lack of participation
 - Concerns about day-use at Posey island and loss of Washington State Parks cooperative management

- Dispersed camping: with limited BLM capacity and over 90% of comments against dispersed camping
- Grassland restoration: increasing to a 5 year plan instead of the preferred 10%
- Forest health: increase opportunities and consider additional eco-system features
- Wildfire: the ¼ mile analysis of nearby structures does not meet the reality of landscape
- Recommends Tribes work with Washington State Parks Supervisors to protect cultural resources
 - MAC discussion of letter. Concerns about Tribes not having their voices heard
 - Chair Proposed a Resolution: Asking MAC to endorse this letter
 - Motion made by Mike Jonas
 - Seconded by Tom Reynolds
 - MAC Voted unanimously in favor of endorsing this letter
- Chair read aloud the Letter she received as MAC Chair written by San Juan County Emergency Preparedness Staff, Brendan Cowan.
 - Main focus of letter was referring to negative effects of dispersed camping, and shooting with potential to cause fires
 - Chair Proposed a Resolution asking MAC to endorse this letter
 - Motion made by Mike Jonas
 - Seconded made by Tom Reynolds
 - MAC voted unanimously in favor of endorsing this letter
- Chair asked all three letters in hard copy form be added to the official meeting minutes
- When does this MAC officially expire? Questioning information found on BLM's website referring to this MAC and under item #11 it states this MAC will expire 9.29.2019 which contradicts previous understandings that this MAC was to be in place throughout the duration of the RMP based on the original Charter.
 - 'How does the MAC continue?' MAC asked Michelle Brown, Acting Spokane District Manager to clarify about how the MAC is to continue; specifically to find answers if this MAC can continue from DRAFT RMP through Implementation beyond the end of this month by asking The BLM Acting State Director.
Michelle Brown, BLM will find out and get the information to Jessica Montcalm, BLM, Acting Monument Manager

Committee vacancies & updates:

- Jessica Montcalm, Acting Monument Manager updated and shared with the MAC that all applications for MAC positions were submitted 7.5.2019 to Washington DC. More than likely due to an overwhelming amount of nationwide applications for other RAC/ MACs it is estimated to be 10-11 months: July 2020 before appointments are made.

Selection of Chairperson and Vice Chair:

- Existing Chair motioned to select a new serving Chairperson, nominating Tom Reynolds
 - Seconded by Mike Jonas
 - MAC vote unanimous: Tom Reynolds new Chair
 - New Chair Tom Reynolds approved former Chair Rhea Miller to continue and facilitate meeting.
- Tom Reynolds motioned to select new Vice-Chair, nominating Tracey Cottingham
 - Seconded by Mike Jonas:
 - Discussion: opening opportunities for other interested parties; none at this time
 - MAC vote unanimous: Tracey Cottingham, new Vice-Chair

Resource Management Plan (RMP) process and timeline:

- Lauren Pidot, SJINM RMP Lead Planner: introduced herself and led the MAC in updates to the current DRAFT RMP EIS situation.
- Lauren shared:
 - Pre-public review of the DRAFT went to the Cooperating Agencies and Consulting Tribes and did not go to the MAC
 - Currently the DRAFT is in internal BLM review
 - Currently the document is at the OR/WA State Office, BLM,
 - Maybe in about 2 weeks' time the document will move to Washington DC DOI
 - The published document could be available no earlier than late October; it is really hard to say exactly how long things may take for DC to move it along
 - Once published there will be a 30 day Public Protest Period running concurrent with a 60 day Governor's Consistency review
 - If there are closures to Hunting or shooting in the Proposed, there are new Dingle Act requirements, adding an additional 60 day Public Comment period for proposed shooting closures
 - Clarification on how to file a protest and emphasized following the "Checklist" to ensure protests and the time folks spent on them are valid and helpful towards the final outcome
 - Clarification on the post Record of Decision (ROD) process and the process for amending the plan if needed due to changing times and circumstances. The Resource Management Plan is scheduled for review every five years. Additionally, if substantial adjustments are needed then those adjustments are made through Resource Management Plan amendments, and additional public comment periods would take place
 - Clarification on who reviews the protests. Washington DC BLM is the official reviewer and more than likely would work with local BLM Offices on establishing which protests are to be considered

- Clarification on Charter processes and how two years ago a host of Charters were lumped together and approved all at once. It is hard to say if this would happen again given current trends.
 - MAC member asked “Is BLM in violation of Proclamation regarding the MAC position and participation in this process?”
 - Acknowledgment that during the first two years of the process the MAC was deeply engaged and this involvement shaped the development of the Draft RMP/EIS. The inability of the MAC to meet over the last two years was unfortunate and prevented the MAC from providing comments as a group on the published Draft RMP or recommendations as a group on the Proposed RMP.
- MAC asked for a heads up and as much of an early notification prior to when the Proposed is Published.
- Clarification about Post ROD processes, once the ROD is signed the BLM will then focus towards implementation
- Clarification on how Budget and Fiscal year monies affect the implementation process:
 - Monies do come around throughout the year and there are many things that can be implemented rather quickly without costing too much money, such as signs and information sharing
 - Michelle Brown, BLM, shared that Fiscal Year 2020 monies will have to be approved by Congress and the existing projections are not all that promising
- Clarification on the size of the document at FINAL ROD Proposed and Published.
 - No more than 300 pages and will still have all the appendixes.
 - There will be additional appendixes added that were not part of the Preferred DRAFT, and there should not be too many extensive changes in the document
 - The FINAL Proposed could be an assortment of items pulled from the Range of Alternatives
 - There will also be an Appendix added which will have the FINAL decisions pulled from the existing text to identify those decisions
- Concern shared by MAC members that if the Proposed published document comes out during the Holidays, it may be difficult for them to participate in a review
- Clarification that the MAC could protest as the MAC and also as individuals
- Clarification of span of time needed to officially hold the next potential MAC meeting. 90 days to get meeting published in the Federal Register to ensure it's published 30 days prior to the meeting.

Public Comment Period

Tom Reeve: local resident, former MAC Chair and member of Islanders for the San Juan Islands National Monument (formerly known as: INCA)

- Recommend MAC stay engaged and keep moving forward

- Commended Local BLM Staff: Marcia, Jessica, Skeet, and Nick for their openness and willingness to work together
- Referenced Congressman Rick Larsen's letter:
 - BLM must follow established CFRs regarding RMP Processes for the MAC
 - Must follow Proclamation
 - MAC did not had a chance to review the DRAFT Alternatives
 - MAC did not get a chance to discuss dispersed camping
 - Recommended MAC and Public stay engaged
 - Referenced the Governor's 60 day consistency review period and shared details of this process
 - Encouraged MAC and public to learn more about other local and state plans and how the possible proposed RMP might be in conflict with these existing plans. This will help the Governor make a case during consistency review. Also recommended figuring out who they need to talk to learn more and better understand these existing plans

Chuck Schietinger: local resident and engaged throughout this entire process

- Supported the MAC endorsement of the 3 letters and asked folks to raise their hands in the audience: "who also supports the 3 letters" over 90 % of those present raised their hands
- Encouraged more of the public to endorse the same letters as well
- Thanked the MAC and BLM staff for the continued dedication and support

Asha Lela: local resident, Friends of Chadwick, coordinator for the BLM ACEC Volunteer Monitoring Program, member of INCA, Islanders for the San Juan Islands National Monument.

- Provided overview on how the MAC officially ended up and was part of the proclamation. This community told DOI Secretary Salazar and President Obama that they would only support a National Monument if the community had control and was involved with a voice in the outcomes of the RMP by way of a MAC.
- Shared dispersed camping will be a disaster and damage the Objects and Values of the proclamation.
 - Shared volunteers do not have the capacity to monitor for dispersed camping and fears here 28 year program will fall apart.
 - Concerned about local opposition once the local community finds out about dispersed camping and how that will damage the long established relationship with BLM from the local level and nationally.
 - Offered solutions to work with higher-ups in the legislative channels, especially Inslee and Cantwell. Inslee should hear a loud and clear voice from the locals

Sally Reeve: local resident, adjacent land owner to BLM, Iceberg Point, member of INCA, Islanders for the San Juan Islands National Monument.

- Shared there needs to be a strong community voice
- There are good relationships with local BLM and National
- Hoped the BLM will take all they heard and move it up the line
- Shared frustrations there were no MAC meeting during the furlough and no-one to talk with

- BLM is violating the Law; discussed difference between law and Secretarial orders; the Secretarial orders do not supersede Presidential Proclamation
- Proposed FINAL does not meet the Objects and Values.
- Dispersed camping does not meet Objects and Values
 - Local public safety is an issue
 - Hunting: there needs to be a way to keep the public safe.
 - Wildfire potential: the analysis is woefully inadequate
 - Encouraged MAC and community to stay engaged, show strength, show your fight, let's work together, MAC nominees must be approved
- Protests: be prepared, correct, and follow the checklist procedures

Tim Clark: local resident, BLM Volunteer Monitor, Former San Juan County Land Bank Land Steward for Lopez Island.

- Echoed all the concerns and statements of those before him
- Thanked the MAC and BLM staff for all that they do.
- Dispersed camping goes against the Objects and Values
 - Wildfire in the San Juan Island is scary and he is very concerned with no true resources available from DNR and no local Wildfire trained staff.

Troy Olsen: Lummi Nation

- Thanks to all MAC members for their participation and dedication since the beginning of this process.
- Hopeful this monument will protect the environment for future generations
- Concerned the Tribal youth of the future will still be able find their cultural in this landscape
- Concerned there will not be equality for tribal youth in the future connecting to their traditional lands and way of life
- Hopeful Tribes are involved for the Proposed process
- Again thanked MAC for their dedication in the process and planning

Other Items:

- Future MAC meetings: in person and or phone
 - Proposed the following dates:
 - November 13th
 - December 10th
- Former Chair: Rhea Miller expressed that she feels "used" throughout this process and also feels other members of the MAC and public feel the same
- Chair: Tom Reynolds made motion the San Juan Islands MAC respectfully asks the DOI Secretary to extend the San Juan Islands National Monument Advisory Committee in compliance with the Proclamation through the entire life cycle of the Resource Management Plan process and through implementation and ensures appointees are designated from the existing applicant pool in a timely fashion.
 - Seconded by Jackie Ferry
 - Discussion: who will craft this request? Committee members ask Jessica Montcalm, BLM, Government Representative to develop request

- Islanders for the San Juan Island National Monument stated they can help the local community understand the Protest Process and help be liaison with the Governor's Office; Also offered to assist MAC members in ways to help the local community understand the complicated process based on experiences in other places that met with success

DRAFT

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RICK LARSEN
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Congress of the United States
House of Representatives
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COMMITTEE ON
TRANSPORTATION
AND INFRASTRUCTURE

ARMED SERVICES

September 19, 2019

The Honorable David Bernhardt
Secretary
U.S. Department of the Interior
1849 C Street NW
Washington, D.C., 20240

The Honorable William Perry Pendley
Acting Director
Bureau of Land Management
1849 C Street NW, #5665
Washington, D.C., 20240

Dear Secretary Bernhardt and Acting Director Pendley:

I am writing to forward the concerns of San Juan County, Washington and the San Juan Islands National Monument Advisory Committee regarding the Bureau of Land Management's draft resource management plan (DRMP), which are addressed in the attached letter dated May 13, 2019. Particularly, I am concerned the DRMP proposes opening 726 acres of the Monument to dispersed camping, defined as camping anywhere outside of a designated campground. I respectfully request that you consider the attached comments and do not include dispersed camping in the final resource management plan.

Currently, local county and Bureau of Land Management (BLM) staff do not have the capacity to permit and monitor dispersed camping. The San Juan Islands National Monument consists of over 450 remote islands, rocks and pinnacles. Its two thousand acres are interspersed with national parks, state parks, United States Fish and Wildlife Service land and Washington state land with no clear delineation between the different jurisdictions. Local staff will not be able to effectively keep visitors from camping on these other lands or ensure visitors on national monument land are being good stewards. Without proper oversight, dispersed camping could have potentially harmful impacts on habitat, cultural resources and landscapes in the San Juan Islands.

Further, the DRMP does not consider the unique challenges dispersed camping creates for emergency medical services (EMS) and fire fighting in the San Juan Islands. San Juan County is a small, rural community, with EMS and fire resources concentrated on three main islands - Lopez, Orcas and San Juan Island. As a result, the county has limited ability to reach the outer islands in an emergency, presenting an undue risk to dispersed campers and local ecosystems.

For these reasons, I ask that the final resource management plan not include dispersed camping in the San Juan Islands National Monument. I also ask that you consider the attached comments

provided by San Juan County, Washington in consultation with the San Juan Island Monument Advisory Committee. I echo the concerns they share and urge the department to work with local officials and stakeholders throughout this process.

Sincerely,

A handwritten signature in cursive script that reads "Rick Larsen".

Rick Larsen
Member of Congress



San Juan County Council

JAMIE STEPHENS – CHAIR

District #3

350 Court Street, No. 1, Friday Harbor, WA 98250

(360) 378-2898

May 13, 2019

Linda Clark
District Manager
Bureau of Land Management
Spokane District Office
1103 North Fancher Road
Spokane Valley, WA 99212-1275

Re: 1610 (ORW000) San Juan Islands National Monument Management Plan

Dear Linda:

The draft Resource Management Plan (RMP)/EIS contains actions. It addresses issues that run counter to discussions and agreements reached during the lengthy planning process. The San Juan County citizens who fueled the grassroots support of the Monument process wanted not only the permanent protection of the landscape, but also a management plan that reflects local interests.

As the San Juan County Council's representative to the Coordinating Agencies and a Monument Advisory Committee (MAC) member, I submit the following comments for review and possible changes to the draft plan:

Monument Advisory Committee

As stated above, the citizens of the County supported the establishment of the monument, and they are integral to its management in several different ways. There should be a commitment to the continuation and importance of a Monument Advisory Committee. It should receive the same recognition as the tribes with an advisory committee (19:8). The charter states that MAC duties are to provide input in the planning and implementation phases of the plan, and it is subject to annual renewal by the President. Resolving the uncertainty is important to our citizens.

In spite of the Monument Advisory Committee being highlighted in the executive summary (viii: 11), it should be stated that the MAC did not meet and comment on the published draft EIS/RMP or proposed RMP. The Department of Interior did not make appointments to the MAC in a timely way, thereby leaving it without a quorum during this period, and thus unable to meet.

The MAC did not provide input on the preferred alternative (299:19), since it did not meet.

Dispersed Camping

Dispersed camping should be eliminated from the RMP.

San Juan County Code 12.12 restricts camping on county property to designated camping and rest areas. We have spent hundreds of thousands of dollars to manage and mitigate the impact of visitors to the islands, and have designed our camping regulations accordingly. Of the 1200 public comments submitted, 90% did not want dispersed camping.

Although camping on monument lands may have been previously possible without a plan, most commenters did not know this because of the restrictions of the County Code.

The RMP references the County Visitor Study (168:3) as justification, citing 93% of the visitors wanted more camping, which is out of context. The visitors wanted more camping instead of more hotels and physical lodging structures. More camping may be more of a perception than reality. During the peak season of June through September, San Juan County Parks' campsites had a utilization rate between 28% and 64%. The visitors surveyed came to islands by ferry and only one proposed site is on a ferry served island.

Dispersed camping should not be allowed until a complete cultural survey is done to protect unidentified cultural resources.

Dispersed camping does not respect the species and habitat protection mentioned in the proclamation. It is repeatedly cited in the document (78:16, 80:1, 82:4, 82:20, 85:10, 273:29, 276:32, 278:30) that dispersed camping has a negative impact on vegetation and other resources.

Local staff does not have the capability to permit and monitor the effects of dispersed camping to habitat, cultural resources, and landscapes. Additionally, monument staff has limited capabilities for enforcement.

The RMP does not take into account the lack of water and fire danger. Human waste would detract from the visitor experience and there is little top soil to manage it.

Camping

Camping on Posey Island should not be eliminated, nor converted to day use only. Currently, Posey Island is managed by Washington State Parks for camping. WSP issues permits, monitors conditions, and takes enforcement actions when needed. Conversion to day use only will take State Parks out of the picture along with the monitoring capabilities they provide. This island is easily accessed from nearby boat launch facilities, and is a place of refuge in bad weather for kayakers and small craft.

It would be better if the tribes could work with the superintendent to find ways to accommodate camping, while protecting cultural resources.

Closing Posey Island is inconsistent with additional dispersed camping.

Vegetation Management

The proposal to manage the vegetation classes to their 2016 extent is not sufficient to address effectively the fire-dependent grasslands referenced in the proclamation (61:12). The monument has the opportunity and obligation to restore a greater area of grasslands, thereby restoring some of the habitat diversity that existed in decades past and providing for sufficient habitat. This will ensure that the species found in those areas are protected from habitat loss elsewhere in the archipelago.

The proposal to limit the forest removal for grassland restoration to a fixed percentage of 10% should be changed (71:28). A better approach is to manage for the vegetation recovery of five years. This allows the maximum possible removal of forest for grassland restoration, while still complying with Visual Resource Management.

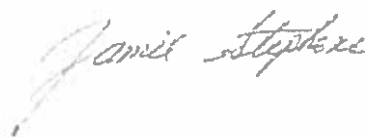
Other

Wildfire Analysis: The wildfire analysis (245:16) focuses on structures within ¼ mile of the monument "as most spotting typically occurs within ¼ mile of torching or crowning trees." This does not adequately consider structures beyond ¼ mile from the boundary, but within 1/4 mile of the vegetation that extends across the monument boundary. It also does not consider non-structural risk, such as, the ability of a fire near Iceberg Point to cut off firefighting access and escape routes for lands, structures, and occupants on the other side of the fire.

The wildfire analysis does not discuss, nor consider the limited resources available in the San Juan Islands to provide immediate response to protect lives and property. Site access is difficult on most of the monument property and mainland resources, or lack thereof, are not adequately considered.

Thank you for your consideration of these changes.

Sincerely,



Jamie Stephens, Chair
San Juan County Council

c: Governor Inslee
Senator Patty Murray
Senator Maria Cantwell
Senator Liz Lovelett
Representative Rick Larsen
Representative Debra Lekanoff
Representative Jeff Morris
Lauren Pidot, BLM
Marcia DeChadenes, BLM

**SAN JUAN COUNTY EMERGENCY MANAGEMENT
PO BOX 669, FRIDAY HARBOR WA 98250 / PH 360-370-7612**

Ron Krebs, Sheriff

Brendan Cowan, Director

San Juan Islands National Monument
Monument Advisory Committee
Attn: Rhea Miller, Acting Chair

May 23, 2019

RE: Wildfire Risk and Land Use Allowances on National Monument Properties

Ms. Miller:

This letter is written to express concerns about the potential for the SJI National Monument Resource Management Plan to allow for dispersed camping and firearm discharge on monument properties.

My primary concern is with the wildland fire risk posed by these allowances. The San Juan Islands National Monument is located within an area of extremely low rainfall compared to the rest of Western Washington, and much of the terrain is comprised of habitat with a high potential for wildland fire. These grass, meadow, and dry forest lands ignite easily and burn quickly. There is high potential for expended bullet casings or careless camping practices to be the cause of a potentially catastrophic fire event.

In addition, Monument properties are located in areas that are very difficult to access with fire fighting resources and have virtually no readily available fresh water supply for fighting fires. All are islands, and the vast majority of these islands have no regular ferry service. There are no Federal or State fire fighting assets in the area, local fire fighting agencies have limited jurisdictional authority for Federal Monument lands, and have limited capacity to respond to the remote areas involved. Aerial fire fighting assets controlled by the State of Washington are not located nearby and during peak fire season are often literally on the other side of the State.

For these reasons, I respectfully ask that safety and common sense prevail and limits be placed on use of Monument properties to minimize fire danger and ensure the safety of first responders and residents living nearby.

Regards,



Brendan Cowan
Director
Department of Emergency Management
San Juan County /Town of Friday Harbor
Friday Harbor, WA 98250
360-370-7612
brendanc@sanjuandem.net

CC:

Mr. Scott Williams, Chief, Orcas Island Fire & Rescue
Mr. Norvin Collins, Chief, San Juan Island Fire
Mr. J Havner, Chief, Lopez Island Fire & Rescue
Mr. Jon Shannon, Chief, Shaw Island Fire & Rescue
Mr. Jamie Stephens, Chair, San Juan County Council