

Whidbey Environmental Action Network
PO Box 293, Langley, WA 98260
(360) 222-3345
www.whidbeyenvironment.org

Feedback on the Draft Parks and Recreation Element: Shortfalls in Definitions, Use of BAS, and Land Stewardship Prioritization

Please include these comments in the official public record regarding the 2025 Comprehensive Plan update. These comments are submitted pursuant to the public participation requirements of the Growth Management Act (RCW 36.70A). WEAN requests that these comments be included in the final record of adoption and that we be notified of all future hearings, work sessions, and final actions regarding this matter.

While the 2025 draft makes strides in acknowledging the need to protect habitat within parklands, a deep dive into the technical details reveals significant inaccuracies and policy shifts that prioritize active recreation over ecological integrity.

Some of our requests include:

1. Reverse Systematic Removal of "Passive" Recreation

We are deeply concerned by the repeated striking of the word "passive" from recreation goals throughout the draft, including sections 1.1, 2, 2.1, 2.5, 4.7.7, 5.1, and 8.6.

- In a park context, "**passive**" refers to recreation that does not require landscape alteration or motorized use.
- Replacing this with "**outdoor recreation**"—a much broader term—implies that sensitive natural areas may now be opened for **intensive "active" developments** like ballfields, disk golf, or hardened trails.
- **Request:** Restore the term "passive recreation" to ensure a clear distinction between low-impact activities and intensive development.

2. Raise Scientific Standards & Correct Mapping Errors

The draft relies on habitat quality rating criteria that do not reflect Best Available Science (BAS).

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- **Arbitrary Acreage Thresholds:** Requirements for "high quality" prairies (5+ acres), wetlands (5+ acres), and oak woodlands (10+ acres) would disqualify most of the island's critical remnants, which are often small but ecologically vital.
- **Botanical Inaccuracies:** The draft misspells *Roemer's fescue* as "Romer's" and claims a lack of "listed species" in areas where specialized databases confirm they exist.
- **Geographic Errors:** The draft claims oak woodlands exist south of Coupeville, yet the southernmost stands are at Schoolhouse Prairie, well north of town. It also claims "wetlands that extend from coast to coast" at Penn Cove, which is geographically impossible.
- **Request:** Adopt the established definitions and standards of the **Washington Natural Heritage Program (WNHP)** and **NatureServe**.

3. Avoid Divestment of Public Land (Goal 5)

Section 5 suggests divesting park lands that do not conform to the new comp plan or "areas of focus".

- We strongly oppose this; stewardship of the public interest implies **the County should not divest itself of the public's land**.
- Properties like the Hurt property demonstrate **the value of "quiescent" land**; though it has lacked public access for decades, it remains a vital undeveloped asset for the future.
- **Request:** Remove divestment language to prevent the permanent loss of open space to private development.

4. Stop Subordinating Habitat to Recreation

The draft explicitly states that the County will "limit its focus to habitat areas that have the capacity to address outdoor recreation needs".

- **This treats habitat as an amenity for human use** rather than protecting it for its intrinsic value.

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- Without a habitat acquisition and protection plan for its own intrinsic value, Goal 1.2's push to "draw users from throughout the region" risks **over-tourism in sensitive areas.**
- Request:** Decouple habitat protection from recreational capacity to ensure ecological sites are preserved based on biological significance.

5. Address Site-Specific Concerns: Deer Lagoon & Camping

- Deer Lagoon:** As addressed in our feedback on the Natural Resources element, this site is currently treated as a recreational park despite federal grant requirements to manage it as a habitat preserve. It should be stewarded using a management plan like the one drafted by Carlos Andersen in 2025. Similarly, other areas valued primarily for their habitat and ecosystem functions should be managed differently than parks.
- Camping Shortages:** While the County seeks to "diversify activities" on existing parks, there is a shortage of campsites on South Whidbey. The County could focus on fulfilling existing plans for primitive camping rather than expanding active recreation into sensitive habitats.

The draft requires significant revision to correct its technical errors, restore "passive" recreation protections, and remove dangerous divestment language.

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Appendix: Technical & Editing Errors

Category	Page / Section	Description of Error or Inconsistency
Scientific Criteria	p. 38 (7.4.3)	Habitat Quality Rating Criteria do not align with Best Available Science (BAS). Use NatureServe or WNHP standards.
Scientific Criteria	p. 42 (7.4.3.6.1)	Oak Woodland "high quality" criteria (10+ acres, trees >80 yrs) exclude most island stands.
Scientific Criteria	p. 38 (7.4.3.2.1)	Prairie "high quality" criteria (5+ acres) exclude small, critical remnants.
Nomenclature	p. 38 (7.4.3.2)	Misspells Roemer's fescue as "Romer's".
Geography	p. 36 (7.4.2.1.5)	Erroneously claims wetlands extend "coast to coast" at Penn Cove.
Geography	p. 36 (7.4.2.1.6)	Claims oak woodlands exist south of Coupeville; they do not.

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Data/Demographics	p. 23 (7.2.3.2.1)	Uses outdated population projection of 102,639, thereby underrepresenting parkland need.
Definitions	p. 11/Glossary	Definition of "Wildlife Corridor" is inconsistent between intro glossary and text.
Land Inventory	p. 19 (7.4)	Includes the Hurt property in trail mileage despite no public trails existing there.
Editing	p. 47 (7.4.4.2.6)	Refers to "Whidbey Camano Lake Trust" instead of Land Trust.
Inconsistency	p. 30 (7.4.1)	Claims Parks will only invest in lands that provide <i>both</i> habitat and recreation.
Mapping	p. 35	Map 7L (protected lands) is missing or referenced incorrectly.
Accounting	p. 55	Double Bluff Dog Park is listed twice, inflating inventory from 5 to 6.