HCPC Hancock County Planning Commission

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John Kelly, Resource Planner
National Park Service
PO Box 177
Bar Harbor, ME 04609

Dear John, October 29, 2004

I am pleased to submit my written comments on the Schoodic Draft General Management Plan Amendment and Environmental Impact Statement in this letter.
Overall I think that the GMP amendment does a good job of summarizing natural features on Schoodic Point. I think the preferred option presents exciting possibilities for the National Park Service, the Schoodic region and Hancock County. The Hancock County Planning Commission has worked with area towns and with the National Park Service in support of continued use of the park facilities and creative reuse of the former Naval Base. We hope that you will feel free to contact us in the future for technical support and planning.

I suggest that the summary of social and cultural issues (page 94-95) can be improved with some additional information. In particular I suggest additional reference to the Schoodic National Scenic Byway running the length of the Schoodic Loop Road. The Management zoning map highlights roads and trails in the park as a "preservation sub-zone", but does not note that the loop road is a National Scenic Byway, nor did I find a discussion of the implications of this designation. As you know, byway status provides opportunities for the National Park to compete for grants that can be used for preservation, interpretation and education. While I think that there are tangible benefits to this national designation, there may also be issues of concern. In particular, concerns have been expressed that byway designation may result in a larger number of summer tourists to the peninsula, and particularly summer tourists driving large recreational vehicles. I recommend that the General Management plan acknowledge the existence of the byway, possibly referring to documents like the adopted corridor management plan available online at www.schoodicbyway.org. I further recommend that some of the opportunities and concerns related to having a national byway in a national park be addressed. One issue that has come up repeatedly is the need for a park-and-ride lot that would encourage

Response:

A reference to the Schoodic National Scenic Byway has been added to the Schoodic DGMPA/EIS at the end of the first full paragraph on page 13. The following management objective has been added to the Schoodic DGMPA/EIS under "Cooperative Efforts and Partnerships" on page 34: "Coordinate with the State of Maine and local corridor management committee to plan, develop, and manage the Schoodic National Scenic Byway."

Data concerning possible impacts of the national scenic byway designation on the Schoodic District and its socioeconomic environment were not available for consideration in the environmental impact analysis or essential to evaluating the alternatives since increased visitation was assumed in any case.

Management zones in the Schoodic DGMPA/EIS provide the NPS with broad direction on how areas of the Schoodic District will be used and maintained. The national scenic byway designation does not have particular implications on the management zones, but they are consistent with the purposes of the Schoodic National Scenic Byway nonetheless.

Issues involving levels of visitation and impacts of motor vehicles were not identified in the planning process as being associated with the national scenic byway designation. The Schoodic DGMPA/EIS, however, describes a number of management objectives that address these issues, including

visitors to leave their recreational vehicles behind and visit the park by shuttle bus or in the cars that they have in-tow.

Other social and cultural issues, particularly those related to the natural resource economy such as commercial fishing, fish processing, timber harvesting, farming and quarrying receive little emphasis in this plan. I believe they deserve some attention as each has the potential to affect the park environment as well as the visitor experience. The working landscape of the Schoodic region is an important asset for the National Park Service. Recognition is likely to be a step toward integrating these "local" activities and local people in the planning and development process. The conversion of farmland, forest land and waterfront marine activities to residential and retail activities affects the park and visitors coming to the park.

Finally, I encourage the National Park Service to add detail to the final section "Summary of Planning". Perhaps this is the place where the Park Service can lay out an action agenda for the next several years. As written, the document does not provide readers wishing to continue collaborating with the National Park Service with very clear ideas of what comes next nor how they can participate. While there are some precise objectives for reuse of the park's physical assets, there is less specificity in the process for future planning and public involvement. I understand that the process is underway and encourage the plan to include goals, objectives and strategies for public involvement.

Thank you for this opportunity to comment on the draft General Management Plan Amendment. Please contact me if you have any questions.

Sincerely,

James H. Fisher

cc. Schoodic Scenic Byway Corridor Management Committee
Tom Martin, HCPC
Bret Poi, Maine Department of Transportation

Response (continued):

cooperating with the State of Maine and neighboring towns to develop parking and other facilities outside of the park to support an alternative transportation system.

While the Schoodic DGMPA/EIS does not expressly address issues related to commercial fishing, timber harvesting, farming, and quarrying, the management objectives include maintaining regular communication and consulting with neighboring communities on matters of mutual concern, and encouraging compatible land uses adjacent to the park on the Schoodic Peninsula and surrounding islands.

An action agenda was not included in the Schoodic DGMPA/EIS because it will continually change as funding and competing priorities dictate. The goals of the Schoodic DGMPA/EIS will be achieved through specific implementation plans and projects. The NPS will develop a prioritized list of implementation plans and projects based on the final plan. All implementation plans and projects are subject to the National Environmental Policy Act, which includes provisions for further public input.

Thank you for your comments.

Kenneth S. Cline
Maine Chapter of the Sierra Club
1 Pleasant Street
Portland, ME 04101-3936

November 16, 2004

John T. Kelly, Park Planner
Acadia National Park
P.O. Box 177
Bar Harbor, ME 04609

Re: Draft Schoodic General Management Plan Amendment and Environmental Impact Statement

Dear Mr. Kelly:

The following comments are being submitted on behalf of the 4500 members of the Sierra Club in Maine and the 700,000 members nationwide. We commend the Park Service for the thoughtful and careful analysis of the possible future of the Schoodic District of Acadia National Park. Specifically, the Park Service has made significant efforts to involve local communities and residents in its planning efforts. Upon review of the Draft General Management Plan Amendment and Environmental Impact Statement, however, the Sierra Club concludes that the Preferred Alternative (Alternative C) does not meet the Park Services obligations under federal law. Sierra Club recommends that the Park Service adopt Alternative A (the No Action Alternative) or Alternative B (the Park Management Alternative) to best meet the requirements of the National Park Service Organic Act.

A. Alternative C impairs park resources in contravention of the Park Service Organic Act

The Organic Act requires the Park Service to provide for the use of national parks in a way that "leaves them unimpaired for the enjoyment of future generations." 16 USC §1. Although the Park Service is given considerable discretion in its management activities, it is bound by the unimpairment standard and by a high duty of care to avoid actions which will adversely affect park resources and values. The Park Service should uphold a standard of strict compliance with all applicable environmental laws and should err on the side of protecting park resources. See *Sierra Club v. United States*, 23 F. Supp. 2d 1132 (N.D. Cal 1998). Federal law expressly places a burden on the Park Service to ensure that "[t]he authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established…." 16 U.S.C. § 1a-1

Repeatedly through out the draft plan, the Park Service acknowledges that the Schoodic district is a very special part of Acadia National Park that is distinguished by its quiet, low visitation, and peaceful character-- "visitors cherish Schoodic for its peaceful character and outstanding scenic beauty" (Draft Plan

Response:

NPS Management Policies 2001 define "impairment" as "an impact so severe that, in the professional judgment of a responsible NPS manager, it would harm the integrity of park resources or values and violate the 1916 NPS Organic Act." NPS policies require an analysis of impairment to resources as part of the environmental impact analysis. Impairment determinations are treated as separate findings from the impact thresholds. NPS policy guidance does not define "impairment" as equivalent to a "major" impact threshold. The Schoodic DGMPA/EIS includes an analysis of impairment and conclusions under each of the major impact topics for each of the alternatives. None of the actions contained in any of the Schoodic alternatives were determined to result in the impairment of resources. However, the definitions of impairment as provided in the Schoodic DGMPA/EIS on pages 99 – 103 are misstated. These definitions are corrected in the final environmental impact statement (pages 17 – 18 of this document) and clarify that a major adverse impact does not equate to impairment.

The NPS acknowledges the potential for adverse impacts and will implement management actions to avoid or mitigate them. Consistent with the goals of the Schoodic DGMPA/EIS, the NPS will ensure that the development and use of the Schoodic Education and Research Center do not detract from the visitor experience or cause unacceptable impacts to park resources or values at the Schoodic District. Management actions to accomplish these goals have

at 13), "quiet atmosphere and low levels of visitation," (Draft Plan at 11), "solitude" (Draft Plan at 19). The Manning study shows overwhelming support for retaining "current use levels and the existing naturalness and solitude of this part of the park." (Draft Plan at18) In fact the Park Services delineates as one of its management goals for the Schoodic District that "[t]he quiet, natural visitor experience of the Schoodic District, offering opportunities for low-density recreation and solitude, is maintained." (Draft Plan at 19) Given this management goal and the distinct character of the Schoodic District it is puzzling how the Park Service can conclude that the proposed development inherent in Alternative C will not impair these very values. The Preferred Alternative will draw as many as 410 people per day to the proposed conference center and nearly double the number of annual recreation vehicle visits to the Schoodic District over baseline conditions (82,546 vs. 169,442). The Park Service acknowledges some of the potential impacts of this increased use. In examining environmental impact associated with such development, the Park Service repeatedly notes the adverse impacts that could be caused by "increased exploration of the base and peninsula by students and visitors." (Draft Plan at 20-21)

The State of Maine Natural Heritage Program has designated Little Moose Island as a "Rare or Exemplary Natural Community" because of its Maritime Shrubland community. (Draft Plan at 82) The Park Service has also zoned Little Moose as a Protected Natural Area Subzone and has set it aside for "strict protection because of its unusual fragility or ecological significance." (Draft Plan Fig. 8) At present the Park Service acknowledges that informal social trails already threaten the fragile vegetation on the island. Little Moose Island is extremely close to the proposed Convention Center and will be the destination for most of the students and conferees during short breaks and for walks close to the center. There is no question that the increase visitation encouraged by the Preferred Alternative will result in further degradation of this designated ecological gem.

To avoid acknowledging the impact that the increased usage will have on the fragile environment of Schoodic Peninsula, the Park Service repeatedly compares the increase in usage under Alternative C to use when the area was a Navy base, the comparison is inapposite. First, the comparison should be between the proposed alternatives, not to some earlier degraded state. This would be like considering a development on top of Cadillac Mountain and excusing environmental impacts based on a comparison to the range of impacts present when the Green Mountain Hotel was in operation. Aside from this obvious problem, by definition, the type of use and impact that occurred during the Navy's tenure is much more limited than that which will likely be caused by groups that come to the center. These visitors will be those that are specifically drawn to a national park and who have a very flexible schedule instead of a regimented work day. The Park Service acknowledges that they will explore the area – that is why they are there. They will also have a different kind of impact on the environment and visitor experience.

Sierra Club takes serious exception to the Park Service conclusion in its NEPA Section 101 analysis, to wit

> Because Alternative B (National Park Service Management) and Alternative C (Collaborative Management) best protect resources, cause the least damage to physical and natural resources, and appear to be most consistent with visitor and community input received to date, they are identified as the environmentally preferred choices." (Draft Plan at 76)

This statement is simply wrong. It is refuted repeatedly by the facts and analysis contained in the very draft. Although the Park Service is not required to choose the best environmental alternative under NEPA, it is disingenuous to state that Alternative C will "best protect resources or cause the least damage to physical and natural resources." The Draft Plan acknowledges several areas where Alternative C will cause adverse impacts to the park resources. Alternative C will "result in adverse impacts to [water] resources compared to the No Action Alternative. The extent of these impacts is unknown, but could be a moderate or major impact to Arey Cove…." (Draft Plan at 116) Similarly regarding vegetation, the draft notes that, "assuming similar use patterns by program participants as other visitors, trails to and from Schoodic Head and elsewhere in the Schoodic District would experience minor to major localized impacts compared to No Action. Directed program use could increase impacts to major." (Draft Plan at 123) Major impacts on park Coastal Resources is also likely to occur. (Draft Plan at 130) Moderate impacts

Response (continued):

been reworded and reorganized in the final environmental impact statement (pages 8 – 15 of this document) to clarify the intent of the Schoodic DGMPA/EIS. Furthermore, the Record of Decision will state the need for the mitigation measures that are presented in the Schoodic DGMPA/EIS to ensure major adverse impacts do not occur.

The Schoodic DGMPA/EIS compares the impacts of the action alternatives to the time when the U.S. Navy was present so that the public has more than one context in which to understand the impacts. The Schoodic DGMPA/EIS uses this baseline to describe benefits associated with No Action. In other words, the departure of the U.S. Navy resulted in positive impacts that can only be explained by comparing existing conditions to earlier conditions. The Schoodic DGMPA/EIS also compares back to this baseline for some of the action alternatives to provide additional perspective. However, in each of these cases, it also compares each action alternative back to No Action, which is consistent with a more traditional environmental impact analysis.

The environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in Section 101 of the National Environmental Policy Act (NEPA). In its "40 Questions," the Council on Environmental Quality recognizes that identification of the environmentally preferable alternative can involve difficult judgments.

from the increased visitor use would also occur to park wildlife resources. There will also be "minor adverse impacts from erosion related to increased program participant use compared to No Action are likely." (Draft Plan at 119) How the Park Service can list these impacts and then conclude that Alternative C will "best protect resources [and] cause the least damage to physical and natural resources" is puzzling. Some of these impairments are only potentialities, however, "it is NPS policy to treat potential impairments in the same manner as known impairments. (U.S. Department of the Interior National Park Service Management Policies 1:4 1988) Yes, there are socio-economic reasons why Alternative C might be the preference of the Park Service. It will preserve historic structures, it could provide greater cultural and economic benefits to the local communities, it will meet some of the Park Services organizational needs, but it will not have less of an environmental impact. That statement is neither supported by the rest of the draft or by the facts before the Park Service. Given the regulatory requirement to address potential impairments, the failure of the Park Service to adequately acknowledge and address the deleterious negative consequences of its preferred alternative is distressing.

B. A convention facility operated by a private operator is inconsistent with the fundamental purpose of our national parks.

In addition to the impairment of the physical environment, there is a fundamental way in which Alternative C violates the intent of the National Park Service Organic Act. Throughout the draft plan, the Park Service refers to the Schoodic Education and Research Center as feeling "like a campus in a national park setting." (Draft Plan at 41) One can seriously question whether a "campus" serves the fundamental purpose of a national park "which is to conserve the scenery and natural and historic objects and the wild life therein ...." 16 U.S.C. §1. As valuable as an education and research facility might be to the area and the Park Service as a whole, we question whether such a facility should be created inside the most remote part of a national park.

Alternative C is particularly disconcerting because it mandates that a non-profit organization operate the education and research center in a way that will put pressure on the non-profit to develop activity in the center. Specifically, it states that "[a] full range of revenue-generating options would be explored to offset program costs." (Draft Plan at 43) Furthermore it mandates that the non-profit be given "sufficient autonomy to be creative and flexible" in developing and managing the center. The draft plan specifically notes that there will be facilities for small conferences, retreats and special events. Essentially the Park Service is creating a conference center with a view. The managing non-profit will be under tremendous pressure to generate significant income and therefore will not be selective in its choice of events hosted at the center. And it certainly won't be limited by what is supposed to be the fundamental purpose of the National Park. The center will be a prime location for corporate retreats and social activates wholly unrelated to the park's mission. Even the examples listed in the Draft Plan itself are worrisome. There is nothing wrong with music and art programs but they are not essential to the mission of Acadia and can occur outside the park. As the Dean of Environmental Law Joseph Sax has noted, creating the appropriate tone for activities within national parks goes to the very heart of the park's purpose and reason for existence. Sax, Mountains Without Handrails at 88 (1980). Like resorts, convention centers do not belong in a national park.

The idea of a Research Learning Center in Acadia is not a bad one. The Sierra Club strongly supports efforts by the Park Service to conduct research in the park and to translate that research into a broader public understanding of the natural world. We even applaud the proposal to collaborate with other groups in providing this outreach and research. However, placing such an intensive use facility in the quietest and least developed part of Acadia is objectionable. Even if the location was not your choice but was dictated by happenstance. Moreover, because of the real risk of the Schoodic Education and Research Center turning into a spectacular conference center on "the wild coast of Maine," the Park Service and not an "independent", "creative and flexible" separate entity should manage the center. Financial pressures being what they are, the non-profit will soon succumb to the need to generate revenue and will subjugate the public trust in the process. Unlike the Park Service, who has a legal duty to uphold its statutory mission and protect the park resources for the public, a non-profit will have a different primary mission. While we

Response (continued):

When mitigation measures are taken in to consideration, the NPS considers Alternatives B and C to be, for all practicable purposes, indistinguishable as the environmentally preferred alternative. Although these alternatives do not achieve the maximum environmental benefits for every Section 101criterion, they best meet the intent of NEPA overall.

Although the Organic Act of 1916 is the fundamental legislation of the NPS, it is subject to subsequent legislation that may further define appropriate uses for national parks. The question of whether a facility such as the former navy base should be created inside the most remote part of the park was not relevant to the planning process since Congress established and expanded the navy base between 1935 and 1947. The NPS must determine how to best use the existing facilities based on NPS laws and policies, public input, and recent legislation that directs the NPS to create a research and education center at the former navy base (see pages 14 – 15 of the Schoodic DGMPA/EIS).

Creating a convention center is not the intent of the Schoodic DGMPA/EIS. Under the preferred alternative (Alternative C: Collaborative Management), the NPS would establish the Schoodic Education and Research Center at the former navy base to facilitate a wide range of education programs and research activities in partnership with other agencies and organizations. An independent nonprofit

applaud the decision not to use a for-profit entity to manage the center, any such program would be best entrusted to the organization whose statutory duty is to preserve and protect the park – the National Park Service.

C. By taking steps to implement their preferred alternative before completing the NEPA process, the Park Service has violated Section 102 of the National Environmental Policy Act.

The Park Service violated the spirit and letter of the National Environmental Policy Act (NEPA) by taking actions to implement Alternative C before the NEPA process was complete. Pursuant to federal law and CEQ regulations, NEPA was enacted to improve federal agency decision-making as regards the environment. NEPA's purpose is to require consideration of environmental factors before tproject momentum becomes irresistible, before options are closed and before the agency makes commitments. This means that the NEPA process, including the solicitation of public comments, is supposed to help the agency make an informed decision on major federal actions significantly affecting the quality of the human environment. Taking steps that suggest that the Park Service has already made up its mind and is not seriously considering public input or options other than the preferred alternative undermines public faith in the NEPA process and violates the law. Courts have repeatedly criticized agencies (and struck enjoined agency action where the NEPA document is nothing more than a "post-hoc rationalization" of agency actions.

It appears that the Park Service has been holding meetings and other exercises to design the new Schoodic Education and Research Center even though no final decision to operate such a facility has been made. Furthermore, the Park Service has already helped create and apparently chosen the non-profit to run the center – the Acadia Partners for Science and Learning. Acadia Partners for Science and Learning itself is already taking steps to implement Alternative C. It has run ads for an executive director.

> Acadia Partners for Science and Learning (Acadia Partners), a dynamic new nonprofit organization seeks a proven, results-oriented Executive Director to launch a new research and education venture in partnership with the National Park Service. The Executive Director will work in concert with a committed and capable Board of Directors and the National Park Service to chart and implement the strategic direction of the new Schoodic Education and Research Center, which is located in Acadia National Park in Winter Harbor on the Schoodic Peninsula in Maine.
>
> The Executive Director will be responsible for all aspects of Acadia Partners for Science and Learning, and for management of the Schoodic Education and Research Center in partnership with the National Park Service.

This advertisement was run even though the Park Service is legally supposed to be considering other options than building the center. If this process is to have any integrity and if the Park Service is at all serious about public input, then actions taken to implimnet the Preferred Alternative should wait until at least after the close of the public comment period. The Sierra Club hopes that the Park Service actually takes public comments seriously and uses them in evaluating alternatives under NEPA. We further request that no contracts with Acadia Partners or other groups and no personnel be hired to administer the center proposed in Alternative C until the Park Service has fully considered public input and rendered a decision pursuant to NEPA. At a minimum no decision "shall be made" until at least 90 days after the publication of the draft EIS. 40 C.F.R. § 1506.10(b).

Thank you for the opportunity to comment on the draft plan. The Sierra Club appreciates all of the hard work undertaken by the Park Service in preparing this plan. We commend you on your efforts to constructively use the old Navy base in a way that promotes scientific and public understanding of Acadia National Park. However, to protect the incomparable resources of the Schoodic District, we believe that Alternative A, the no Action Alternative or secondly Alternative B, the Park Management Alternative, would better protect park resources, cause the least damage to physical and natural resources, and best "leaves them unimpaired for the enjoyment of future generations."

Sincerely yours,

Response (continued):

organization would develop and manage the Schoodic Education and Research Center in cooperation with the NPS. The nonprofit would serve as an umbrella organization to coordinate the use of the facilities for research and education purposes. The nonprofit would solicit partner organizations, maintain buildings, and manage food service, lodging, and the use of program space (e.g., meeting rooms, offices, studios, laboratories). The nonprofit organization would also play a major role in providing financial support for the Schoodic Education and Research Center. The cooperative agreement and/or lease would describe the respective roles and responsibilities of the NPS and nonprofit organization, and ensure that the development and use of the Schoodic Education and Research Center do not detract from the visitor experience or cause unacceptable impacts to park resources or values.

The NPS has taken measured steps to reusing the former navy base consistent with the park's mission, public input, and legislative direction. Importantly, these interim actions have informed the planning process and contributed to the NEPA analysis by indicating the potential scope and scale of the proposed research and education center.

Thank you for your comments.

Comments on Schoodic Draft General Management Plan Amendment

by Schoodic Futures and The Friends of Schoodic

Presented on October 20, 2004 by Bill Zoellick
Vice President, Schoodic Futures
Secretary, The Friends of Schoodic

Good evening. My name is Bill Zoellick. I represent the local organizations "Schoodic Futures" and "The Friends of Schoodic," which is a committee of Schoodic Futures. Both organizations are volunteer groups interested in and working on the Schoodic Peninsula. We have an intense interest in the Schoodic District of Acadia National Park because of its economic, aesthetic, and cultural importance to the local communities and their citizens. We appreciate this opportunity to make comments regarding the proposed General Management Plan Amendment..

I should say at the outset that both organizations are in support of alternative "C" – the "Collaborative Management" alternative. However, we have two concerns about the implementation of this alternative.

Our first concern is in regard to the entities that become users and tenants of the SERC campus. We have become aware of situations within other National Park units wherein commercial, corporate entities have become, in our view, too intrusive and visible within the unit. This corporate intrusion appears to have been permitted in order to secure corporate sponsorship and funding. We are anxious to see SERC inhabited by educational and research groups focused on a mission compatible with that of the Park. We believe that having corporate sponsors that bring corporate presence and an overly commercial focus to the operations – taking the focus away from research and education – would not be in keeping with the nature and the mission of the Schoodic District of Acadia National Park.

Our second concern revolves around increased traffic. The numbers of staff and participants projected in the GMP plans appear to imply considerably increased traffic counts over time. We encourage the National Park Service to focus on the concerns identified on page 72 of the plan: the "visitor experience, perceptions of crowding and quiet enjoyment, visual quality, night sky, and the natural soundscape." We recommend that focusing on protection and even enhancement of these qualities should be a primary objective that guides and constrains other parts of the plan.

Thanks very much for hearing our concerns. We extend an offer to assist in any way we can with realization of this plan. We look forward to supporting the Park Service in implementing the plan in the best possible fashion for all who use and enjoy the Schoodic District of Acadia National Park.

Response:

The Schoodic DGMPA/EIS would limit commercial use in the Schoodic District to ensure that its character does not change. Recognition of corporate sponsorship and funding of NPS programs and facilities is restricted by NPS policies to prevent overt commercialism in national parks. The NPS would ensure that the use of the Schoodic Education and Research Center focuses on appropriate research and education programs and activities. Corporate entities could participate in the research and education programs and activities of the Schoodic Education and Research Center, but industrial and similar business activities would not take place within the park.

Many of the management objectives of the preferred alternative of the Schoodic DGMPA/EIS (Alternative C: Collaborative Management), including those that are common to all alternatives, focus on protecting park resources and values. The Schoodic DGMPA/EIS emphasizes the need to retain the relatively quiet nature of the Schoodic District and includes management objectives to minimize the impact of motor vehicles on park resources and values. Detailed implementation plans and management actions would follow the Schoodic DGMPA/EIS to ensure that its goals are met.

Thank you for your comments.

Robert.Blackwell@piedmontng.com
10/01/2004 02:42 PM AST

To: john_t_kelly@nps.gov
cc: stephanie@friendsofacadia.org
Subject: Schoodic planning

As a member of Friends of Acadia I support their position on future use of the land and facilities of the former Navy base on the southern tip of the Schoodic Peninsula that Acadia National Park inherited in July 2002.

Friends of Acadia supports Alternative C, the Collaborative Management Alternative because it maximizes thoughtful re-use of the Navy facilities to
improve educational offerings and to foster research activities. Alternative A falls short because the Navy buildings would be maintained without proposed uses. While Alternative B broadens the scope of program offerings, it relies too heavily on the National Park Service to manage SERC, rather than building partnerships to bring additional resources to SERC's programs and facilities.

Friends of Acadia strongly supports the management goal, common to all three
alternatives, of maintaining Schoodic as a quiet place of discovery and enjoyment of nature. The organization also supports removal of buildings and restoration of grounds that after a reasonable period of time are deemed
not necessary to SERC or Park operations. Friends also strongly encourages the Park to replace the water tower with a ground level tank that will not be visible outside the Park.

Robert Blackwell
1124 Red Coat Drive
Charlotte, NC 28211-4744

Response:

The Schoodic DGMPA/EIS includes the objective of maintaining opportunities for low-density recreation and solitude in the Schoodic District under all alternatives. The preferred alternative (Alternative C: Collaborative Management) directs the NPS to remove buildings that do not have an appropriate and viable reuse, and to evaluate the option of replacing the water tower with a ground-level storage tank.

Thank you for your comments.