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**ENERGY FACILITY SITE EVALUATION COUNCIL
STATE OF WASHINGTON**

IN THE MATTER OF APPLICATION
NO. 96-1

OLYMPIC PIPE LINE COMPANY

CROSS CASCADE PIPE LINE
PROJECT

APPLICATION NO. 96-1

PREFILED TESTIMONY OF STEVE
GIBBONS

EXHIBIT _____ (SG-T)

ISSUE: GINGKO PETRIFIED
FOREST NATIONAL NATURAL
LANDMARK
SPONSOR: WASHINGTON STATE
PARKS AND RECREATION
COMMISSION

Q. Please provide your name and business address to the Council.

A. My name is Steve Gibbons. My business address is:

National Park Service
Columbia Cascades Support Office
909 First Avenue
Seattle, Washington 98104

Q. Please summarize your employment and educational background.

A. I am currently a Natural Resource Specialist in the Columbia Cascades Support Office (i.e., Columbia Cascades Cluster) of the National Park Service (NPS). My job responsibilities include Program Manager for the National Natural Landmarks Program, Endangered Species Coordinator, Research Natural Area Coordinator, and I conduct National Environmental Policy Act (NEPA) document review.

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Other job responsibilities that I have had during my sixteen years with the National Park Service include:

- Natural Resource Specialist, NPS, Pacific Northwest Regional Office, Seattle, WA
- Resource Management Ranger, Mount Rainier National Park, Ashford, WA
- Park Ranger, Visitor Protection & Resource Management, Mount Rainier National Park, Ashford, WA
- Park Ranger, Visitor Protection & Resource Management, Cape Cod National Seashore, S. Wellfleet, MA
- Hydrologic Technician, Everglades National Park, Homestead, Florida
- Park Naturalist, Everglades National Park, Homestead, Florida
- Air Quality Field Specialist, NPS, Southwest Regional Office, Santa Fe, New Mexico
- Hydrologic Technician, Espey, Huston & Associates Environmental Consultants, Albuquerque, New Mexico

I attended the University of Miami in Coral Gables, Florida and graduated in 1977 with a Bachelor of Arts degree in Geography. As a Graduate Assistant, I also acquired additional graduate credits in Geography from the University of Miami during 1977.

I was selected for and attended a National Park Service sponsored Natural Resource Management Trainee Program during 1988 and 1989. The eighteen-month program included six months of training in a host of resource management disciplines. Program areas included: air quality, water quality, wildland fire management, computer applications, wildlife management, geographic information systems, NPS budget, policy, administration, etc.

1 Currently, I am a participant in a twelve-month Executive Leadership Program sponsored
2 by The Graduate School, U.S. Department of Agriculture, Washington, D.C. The
3 program concludes in August 1999.

4 **Q. Generally, what is the subject of your testimony?**

5 A. My testimony concerns the National Park Service's National Natural Landmarks (NNL)
6 Program, the designation of the Ginkgo Petrified Forest as a National Natural Landmark
7 pursuant to that program, and the effect that construction of the proposed Cross-Cascade
8 Pipeline through the Ginkgo Petrified Forest would have on its NNL status.

9
10 **Q. Please provide a brief overview of the National Natural Landmarks (NNL)**
11 **Program.**

12 A. The National Natural Landmarks (NNL) Program was established by the Secretary of the
13 Interior in 1962 to identify and encourage the preservation of the full range of ecological
14 and geological features that are nationally significant examples of the Nation's natural
15 heritage. The NNL Program has been administered by the National Park Service since
16 May 18, 1962, with the exception of the period from January 25, 1978, to May 31, 1981,
17 when it was administered by Heritage Conservation and Recreation Service (HCRS).
18 HCRS was abolished May 31, 1981, by former Secretary of the Interior James Watt.

19
20 To be considered for national natural landmark status, a site must be nationally
21 significant: one of the best examples of a natural region's characteristic biota or geologic
22 features. Determinations of what constitutes best are based on primary criteria (i.e.,
23 illustrative value and condition of the resource) and secondary criteria (i.e., rarity and
24 diversity of the resource, and its value for science and education). For example, the
25 National Registry of Natural Landmarks includes the largest remaining tract of virgin,
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mixed-mesophytic eastern deciduous forest, the largest meteor impact crater in the United States, and the most diverse deposit of Pleistocene mammalian fossils anywhere.

Since 1973, the National Park Service has sponsored studies of the 33 natural regions of the United States, Puerto Rico, the Virgin Islands, and the island groups of the former Trust Territory of the Pacific islands in order to identify sites for further evaluation. Natural regions under my purview include the Columbia Cascades Cluster, the North Pacific Border, Cascade Range, Columbia Plateau (which includes the Ginkgo Petrified Forest NNL), Great Basin, Northern Rocky Mountains, and Middle Rocky Mountains natural regions. Additional sites, proposed by other Federal and State agencies or interested individuals, can also be considered for further evaluation. Later, expert natural scientists continue to comparatively evaluate the best of the recommended sites. Additional review and screening are then done by the National Park Service and a citizen advisory board.

As part of the designation process, the National Park Service contacts owners of sites under consideration for designation at the beginning and during subsequent stages of the evaluation and designation process; comments are requested from property owners, managers, and other interested parties. The general public has an opportunity to comment on Federal Register notifications. All comments and additional information are considered in determining whether or not to designate a site a national natural landmark. If a majority of landowners do not write to object, and the National Park Service and the advisory board make a positive recommendation, the Secretary of the Interior may then decide to designate the site a national natural landmark.

1 Since the beginning of the National Natural Landmarks Program in 1962, the Secretary of
2 the Interior has designated 587 national natural landmarks. Each landmark exemplifies
3 one of the country's major ecological or geological features. Landmark sites vary from 7-
4 acre bogs to 560-square-mile geological features. Besides Ginkgo Petrified Forest NNL,
5 other landmark examples include the volcanic crater at Diamond Head, Hawaii; the
6 wetlands at Okefenokee Swamp, Georgia; the ice age fossil mammals at Rancho La Brea,
7 California; and the Luray Caverns in Virginia.

8
9 Owners of landmarks include local, state, tribal and Federal governments, but nearly half
10 are privately owned. The National Natural Landmarks Program, which is totally
11 voluntary, encourages property owners to preserve important sites under existing
12 ownership. Such owners can receive and display a bronze plaque, mini-plaque, or paper
13 certificate to publicly acknowledge a site's status as a national natural landmark.

14
15 **Q. What are your specific responsibilities relating to NNL program management?**

16 A. As Program Manager for the National Natural Landmarks Program, I am directly
17 responsible for its administration, which affects thirty-four landmark sites within the
18 states of Idaho, Oregon, and Washington. Currently, there are eleven NNL sites in Idaho,
19 six in Oregon, and seventeen in Washington. As previously mentioned, NNL participants
20 include state and federal agencies, private organizations and landowners.

21
22 Many national natural landmarks require active management to ensure that they remain in
23 good condition. One of my duties as NNL Program Manager is to advise owners on
24 conservation practices (i.e. provide technical assistance), if requested. One example of
25 my technical assistance responsibility involved a formerly threatened site, the Mima
26 Mounds National Natural Landmark in Washington. Owned and managed by the

1 Washington State Department of Natural Resources, Mima Mounds was becoming
2 overrun and seriously degraded by the exotic plant species Scotch Broom. Working with
3 the DNR natural area scientist, we collaboratively submitted a project proposal to restore
4 the remnant mima mounds prairie through the National Park Service's Challenge Cost-
5 Share Program. The two-year project was subsequently funded by the National Park
6 Service for \$30,000. I also provided the state with National Park Service subject matter
7 expertise contacts in the fields of revegetation and greenhouse operations.

8
9 Along these lines, my duties include general landmark advocacy for landowners. This
10 responsibility may take the form of partnership efforts involving funding opportunities
11 like the National Park Service's Challenge Cost-Share Program or participating in NEPA
12 and/or SEPA review on proposals which may affect listed landmarks.

13
14 In addition to administering the NNL program with respect to existing registered sites in
15 Idaho, Oregon, and Washington, I am also responsible for the nomination, evaluation, and
16 designation of new NNL sites in the natural regions under my purview. As previously
17 noted, this process involves the identification of potential landmark sites through natural
18 regional studies, or suggestions from other federal and state agencies or private
19 landowners. Contracts with local scientists are entered into comparatively study these
20 nominated sites. Upon my determination that a site is nationally significant, I am
21 responsible for referring the determination to NNL program managers in Washington,
22 D.C., the Director of the National Park Service, the National Park System Advisory
23 Board, and the Secretary of the Interior. However, there has been a moratorium on new
24 designations since 1989.

1 One of my most important responsibilities, however, is to regularly review the condition
2 of each of the thirty-four national natural landmarks within the three state Columbia
3 Cascades cluster. A typical site visit involves meeting with the land steward at the
4 landmark site and discussing its current status. The discussion usually occurs both within
5 an office atmosphere as well as in the field. The site evaluation process determines
6 whether a landmark site has been damaged or incurred any threats to its nationally
7 significant resources since the last NNL site visit. The National Park Service prepares an
8 annual report on those sites that are damaged or threatened by damage. This report is
9 submitted to Congress on an annual basis by the Secretary of the Interior. I provide input
10 for the report with respect to NNL sites within Idaho, Oregon, and Washington States.
11 Ginkgo Petrified Forest NNL has appeared as a threatened site on the Section 8 Report
12 for the past two years.

13
14 **Q. Are you familiar with the Ginkgo Petrified Forest State Park?**

15 A. Yes. I am familiar with Ginkgo Petrified Forest State Park as a consequence of the
16 National Park Services' designation of Ginkgo Petrified Forest as a National Natural
17 Landmark. I conducted my first documented site visit of the NNL site on May 27, 1992.
18 At that time I met with Ginkgo Petrified Forest State Park Manager Brian Carter. Since
19 then, I have conducted an annual site visit to Ginkgo Petrified Forest State Park in order
20 to perform a site evaluation with Mr. Carter. The only exception was 1994, when
21 Mr. Carter provided a general status of the park over the telephone.

22
23 My familiarity with Ginkgo Petrified Forest State Park was enhanced early on through a
24 cooperative interpretive project, that was funded through the National Park Service's,
25 Challenge Cost-Share Program (CCSP). The Challenge Cost-Share Program provides up
26 to a 50% match for eligible projects involving non-federal partners. CCSP guidelines

1 identify potential projects as being either natural, cultural, recreational, or interpretive in
2 nature. Through collaboration with Park Manager Brian Carter, the National Park
3 Service provided \$6,000 to the park to help fund construction of two interpretive panels
4 explaining the geology of the area, and to provide a small stipend to college students in
5 order to keep the Interpretive Center open to visitors during the summer months.
6 Additionally, in 1997, I was able to garner \$2,000 from the National Park Service to
7 provide a reprint of Ginkgo Petrified Forest State Park's "Trees Of Stone" trail brochure.
8 This special funding provided Washington State Parks with an approximately three-year
9 supply of the brochure.

10
11 **Q. When and why was the Ginkgo Petrified Forest listed as a National Natural**
12 **Landmark?**

13 A. Ginkgo Petrified Forest State Park was designated a National Natural Landmark by
14 former Secretary of the Interior Stewart L Udall, on December 1, 1965. On this date both
15 Ginkgo Petrified Forest State Park and Steptoe Butte State Park became the first two
16 National Natural Landmarks within the Columbia Cascades Cluster.

17
18 Ginkgo Petrified Forest NNL includes 3,036 hectares (7,500 acres). The landmark site
19 represents one of the most unusual fossil localities in the world. Two essential features
20 make this petrified forest world-renowned and of national significance: the large number
21 of genera and species represented, and the unusual preservation of fossils in lava flows.
22 Specimen logs of the ginkgo tree, a species rarely found in fossil wood, also, comprises
23 the landmark site. Ginkgo Petrified Forest State Park was designated a national natural
24 landmark because it met both the primary and secondary national significance criteria of
25 the National Park Service. Ginkgo's in-situ preservation within lava flows satisfied the
26

1 NNL program's primary criteria; its overall diversity, educational and scientific value
2 satisfied the program's secondary criteria.
3

4 **Q. Are you familiar with the proposal by the applicant in this proceeding, Olympic
5 Pipe Line Company, to construct a petroleum pipeline through the park.**

6 A. Yes. I reviewed the Draft Environmental Impact Statement entitled "Cross Cascade
7 Pipeline" issued September 1998 and provided comment from the National Park Service.
8 I have met with Brian Carter and discussed the project as part of my annual site visits the
9 past few years, met with other Parks and Recreation Commission officials in Auburn on
10 one occasion, and have discussed the status of the project over the telephone with Parks
11 and Recreation officials on a number of occasions.
12

13 **Q. Would the construction of the proposed Cross Cascade Pipeline through the Ginkgo
14 Petrified Forest State Park affect the forest's National Natural Landmark status?**

15 A. I believe that the subterranean installation of the proposed pipeline would jeopardize
16 Ginkgo Petrified Forest State Park's national natural landmark status. In particular, it
17 would violate the primary national significance criteria of illustrative character and
18 condition of the resource. In addition, such a project would undoubtedly disturb the
19 exemplary in-situ nature of the fossil forest, thereby having an overriding, diminishing
20 affect on the secondary national significance criteria of rarity within a site (i.e., especially
21 the ginkgo tree) and value for science and education. Disturbance of in-situ
22 paleontological resources of such national acclaim would most certainly result in re-
23 evaluation of Ginkgo Petrified Forest's National Natural Landmark status, and could very
24 well result in loss of its NNL designation.
25

26 DATED this _____ day of February, 1999.

STEVE GIBBONS