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September 16, 2026

To: Coupeville School District
ATTN: Facilities Planning Task Force (FPTF)
501 South Main Street
Coupeville, WA 98239

On behalf of the Whidbey Environmental Action Network (WEAN), thank you for the opportunity to comment on the future location of a new Coupeville elementary school. WEAN understands the district's need to replace and modernize the elementary school and agrees that a new elementary school is necessary. Our comments concern *where* and *how* that replacement should happen. WEAN opposes the Terry Road Site both on ecological grounds — including its impacts on forest habitat, hydrology, and wildlife connectivity — and because it would replace a working agricultural landscape at a principal entrance to Ebey's Landing National Historical Reserve ("National Reserve") with an urban institutional use fundamentally at odds with the agricultural character and natural value the National Reserve is meant to protect. We request that the Existing Site plan be amended to ensure the community can meet its educational needs without permanently damaging the ecological resources and services provided by the current landscape.

1. Selecting the Terry Road Site would cause serious ecological harm.

The Terry Road parcel sits at a corner of working farmland, mature woodland, and the largest prairie ecosystem on Whidbey Island. The impacts of building a 65,000-square-foot, two-story campus here directly contradict the stated mission of Ebey's Landing National Historical Reserve to protect the agricultural and ecological systems that have characterized this land since the 1850s. Development of the 21-acre Terry Road Site would compromise the ecological integrity of the main scenic gateway to the National Reserve and result in significant harm to the flora and fauna that currently occupy it.

Forest loss to relocate the baseball field. The district's Terry Road Site plan shows the relocated baseball field cutting into the parcel's forested area, labeled "planting removal", resulting in a loss of mature forest to move a field that already exists and functions today. Though the loss of these trees may appear to be minimal, converting the surrounding land use of the forest to intensive institutional development compromises the ecological function of what remains.

Compromised ecosystem integrity and degraded habitat. A substantial body of peer-reviewed research on edge effects in fragmented forests shows that microclimate, wind exposure, predation pressure, and invasive-species encroachment all increase near a new hard edge, degrading habitat quality well beyond the footprint that is physically cleared (Haddad et al. 2015). A small, isolated wood lot adjacent to pavement and buildings does not function ecologically the way it does today as part of a larger, contiguous agricultural and woodland mosaic.

Loss of habitat connectivity. The Terry Road parcel's existing athletic fields sit within a habitat corridor of farmland, hedgerows, and woodlands that links the forest around the existing school to Ebey's Prairie and the bluffs beyond. Building a large school, along with parking areas and the daily vehicle trips a new Terry/Ebey intersection would generate, would further fragment this active wildlife corridor.

Stormwater impacts on poorly drained prairie soils. The Terry/Ebey corner has coveland loam soil that drains poorly relative to other soil types. The proposed stormwater detention facility at that corner is undersized for a two-story building, parking lot, bus loop, and drop-off lanes. A meta-analysis of watershed-scale studies confirms that impervious surface coverage remains one of the strongest predictors of degraded downstream hydrology, driving measurable increases in runoff volume and peak flow that require substantial, targeted mitigation to offset (Bell et al. 2020). On prairie soils that notoriously drain poorly, added impervious surfaces without properly sized stormwater retention facilities will increase runoff volume and peak flow into the surrounding farmland and wetland features rather than infiltrating in place.

Light pollution in a dark landscape. A campus with parking-lot, bus-loop, and drop-off lighting introduces a new, continuous source of artificial light at night into a landscape that is currently dark. Peer-reviewed studies of artificial light at night document consistent, measurable effects on bird physiology and behavior, insect abundance and movement, and predator-prey dynamics, even at the relatively low light levels typical of parking-lot and street lighting (Dominoni et al., 2013; Owens & Lewis 2018; Ditmer et al., 2021). The surrounding farmland, wood lots, and prairies that support nocturnal and crepuscular species would be increasingly exposed to light pollution as a result of the Terry Road development.

Critical areas concerns. There is preliminary evidence suggesting that the Terry Road Site may contain wetlands and archaeologically significant resources. Prior to approval of the Terry Road Site plan, a thorough State Environmental Policy Act (SEPA) review would need to be conducted to ensure the site is suitable for development. Approving the Terry Road Site Plan would leave the development highly vulnerable to construction delays and building permit denials. The positive identification of critical areas will trigger additional environmental review, permitting, mitigation, and design requirements, potentially delaying construction of a new school that the community urgently needs.

Taken together, this is not a single, mitigable impact but a stack of interacting ones — forest fragmentation, habitat loss, altered hydrology, light pollution, and reduced habitat connectivity — concentrated at the most visible gateway to Ebey's Landing National Historical Reserve. We also note that the Terry Road Site proposal conflicts with the National Reserve's design guidelines on scale and aesthetics, and with goals in both the County and Coupeville Comprehensive Plans intended to protect this landscape; other commenters have detailed those conflicts, and we share their concerns.

2. The Existing Site is the better design, but the proposed access road would seriously damage the integrity of the forest.

We are concerned that the district's proposal for the Existing Site includes a new access road that cuts diagonally through a mature forest, connecting S Main Street to S Ebey Road. This is not a cost-free alternative to the Terry Road Site; it carries its own ecological consequences. We ask the Facilities Planning Task Force to reconsider previous designs (Figure 1 and 2) that consider the woodland as "Protected Forest Area" before proceeding with the current Existing Site plan.

Bisecting the forest fragments habitat. As aforementioned, forest fragmentation by roads can have serious effects on ecosystem integrity, with significant negative consequences for the flora and

fauna that inhabit it. Roads and the traffic they support are well documented barriers to wildlife movement and are a direct source of mortality, an effect confirmed across ecosystems (Forman & Alexander 1998; Glista et al., 2008; Bennett 2017). The loss of forest cover here would also remove the buffer that currently separates the developed campus from the open National Reserve farmland to the west, destroying a visual and ecological barrier appreciated by humans and wildlife alike.

Bald eagles nest is in this forest. The County's own IC Geo mapping resources identify the forested area on the Terry Road Parcel (R13104-510-2820) as falling within a protected Bald Eagle Management Zone. The U.S. Fish and Wildlife Service's (USFWS) National Bald Eagle Management Guidelines (2007) mandate that construction and other disturbing activity be kept outside a buffer of 330–660 feet from an active nest depending on visibility and activity type, with a wider quarter-mile visual buffer recommended where existing tree cover shields the nest from view. These guidelines remain the current federal standard. A paved access road, drop-off traffic, and construction activity cutting directly through this forest would place sustained, highly visible human activity well inside the recommended distances, with a real risk of nest abandonment. We are not aware of any nest-disturbance survey or USFWS consultation addressing this design to date.

We ask the Task Force to research alternative access configurations for the Existing Site — including access from S Main Street and the district's existing parking and bus areas, as well as the protected-forest configuration shown in earlier site plan iterations (Figures 1 and 2) — that avoid or substantially minimize forest removal. If a secondary access point is genuinely needed, a smaller-footprint solution such as a gravel route with wildlife crossings should be explored first, and any design located within or around this forest should be preceded by an eagle nest survey and, if needed, USFWS consultation.

The Whidbey Environmental Action Network requests that the Facilities Planning Task Force recommend the Existing Site over the Terry Road Site, on the condition that its access design is revised to avoid cutting and paving a road through mature forest. This path lets Coupeville replace its elementary school on a realistic timeline while protecting the ecological resources this community has spent decades working to conserve.

Thank you for your time and for the work the Task Force has put into evaluating these options.

Sincerely,

Autumn Maust, Ph.D.
Program Director
Whidbey Environmental Action Network

Figure 1. A site map presented by Coupeville School District Facilities Planning Task Force on February 19th, 2026 that designates the on-site forest as "Protected Forest Area". This designation is not reflected in the current Existing Site plan, where an access road is proposed to horizontally bisect the previously protected forest (Source; slide 14)

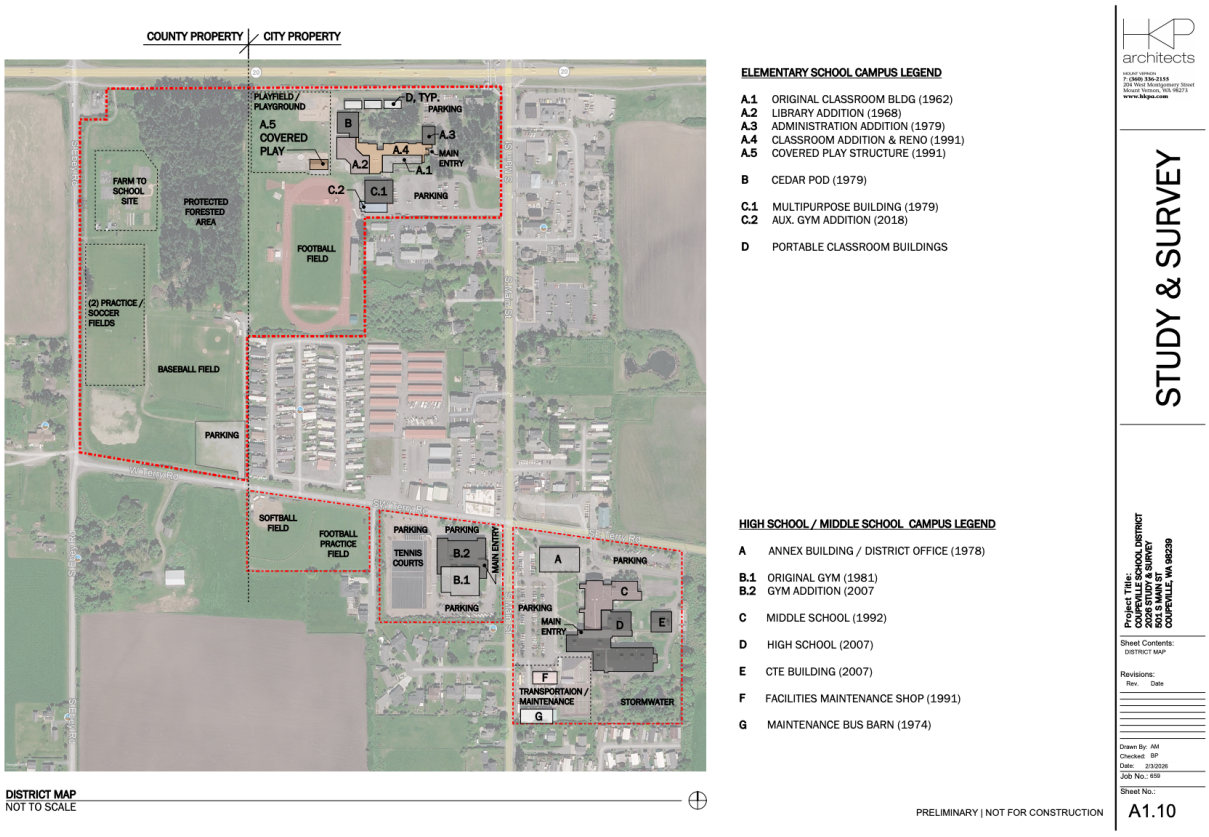
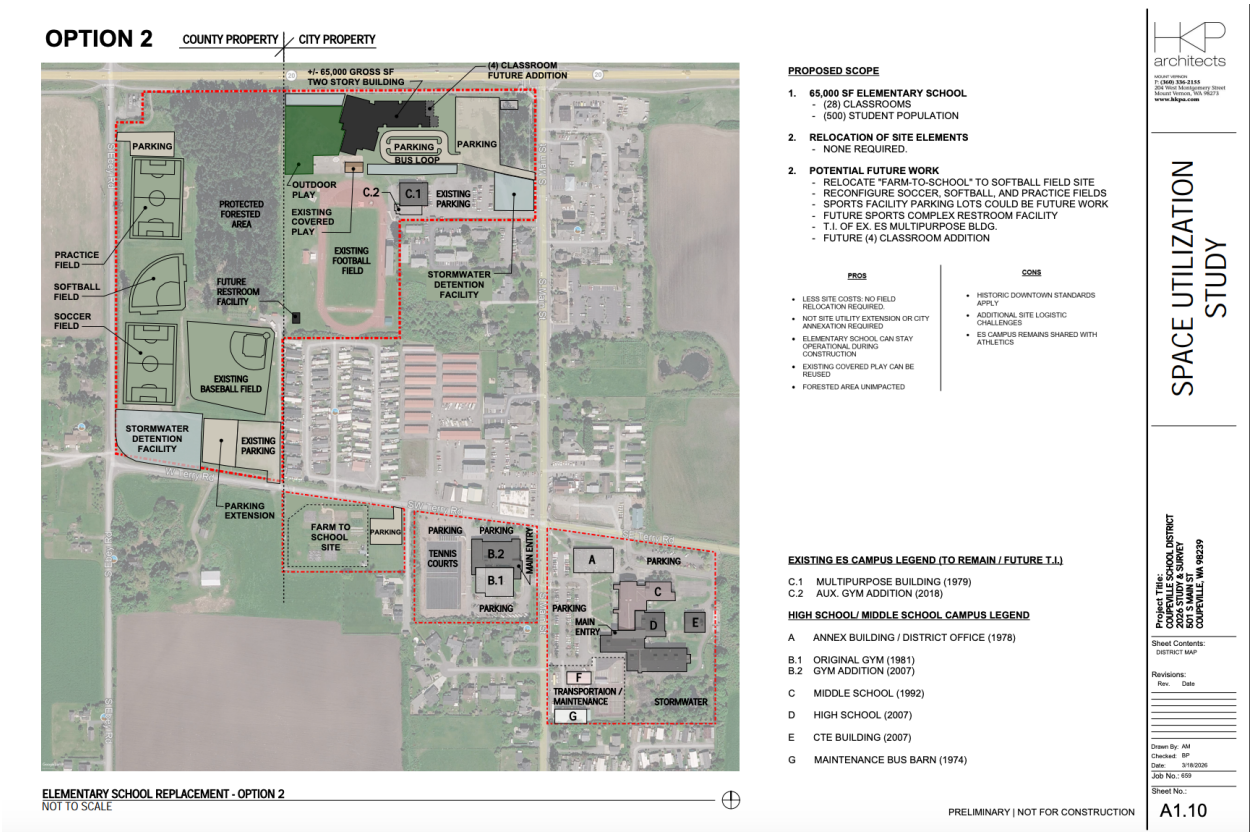


Figure 2. A site map presented by Coupeville School District Facilities Planning Task Force on April 6th, 2026 that refers to the on-site forest as "Protected Forest Area". This designation is not reflected in the current Existing Site plan, where an access road is proposed to horizontally bisect the previously protected forest. We also note that the stormwater detention facility is larger in this design iteration and better reflects the water retention infrastructure needed for poorly drained coveland loam prairie soils adjacent to impervious surfaces (Source; slide 9).



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