

National Park Service
U.S. Department of the Interior

Olympic National Park
Washington



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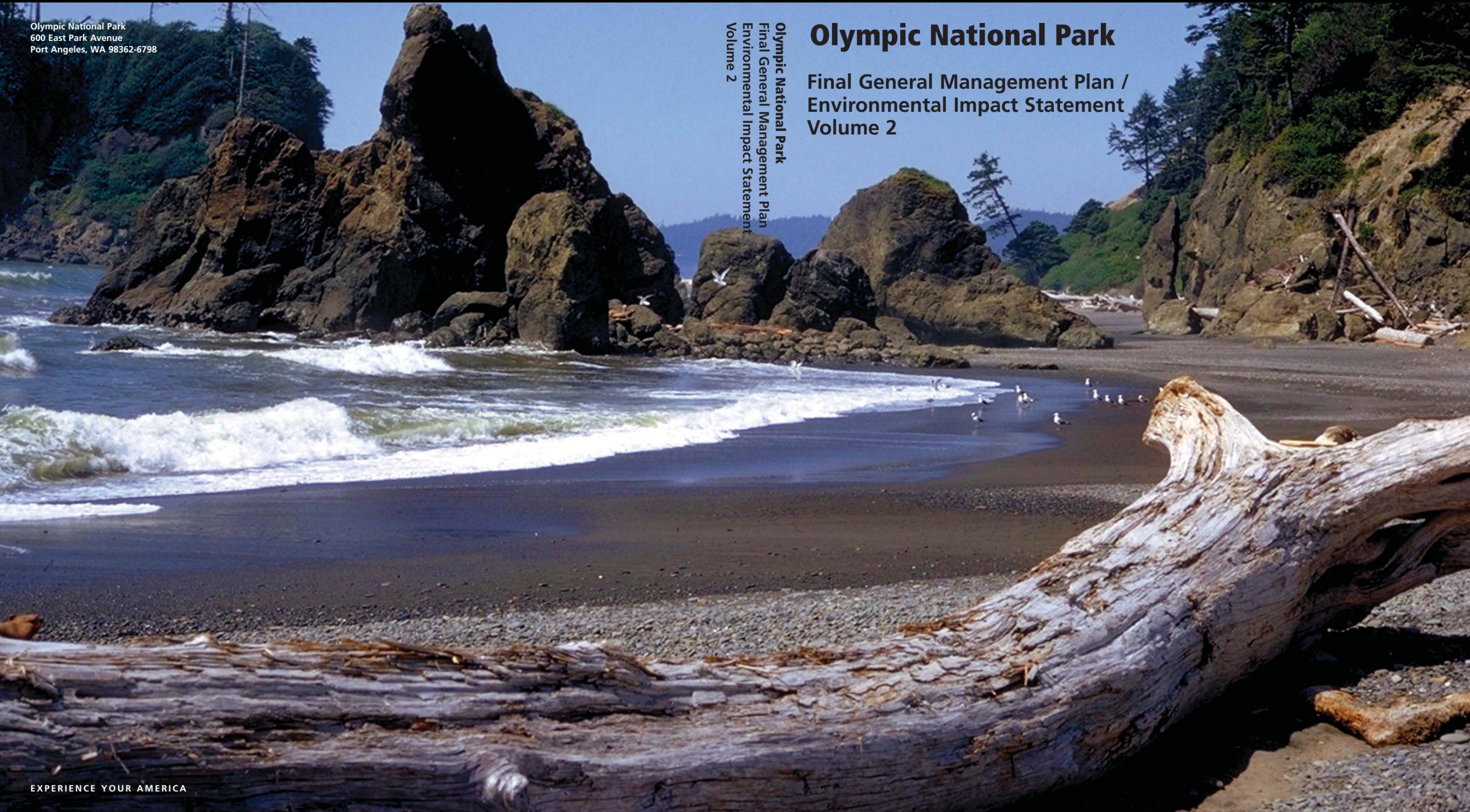


Olympic National Park
600 East Park Avenue
Port Angeles, WA 98362-6798

Olympic National Park
Final General Management Plan
Environmental Impact Statement
Volume 2

Olympic National Park

Final General Management Plan / Environmental Impact Statement Volume 2



**Final General Management Plan /
Environmental Impact Statement
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Chapter 6:

Comments and
Responses

INTRODUCTION

This chapter summarizes the comments received following release of the *Draft Environmental Impact Statement* on June 15, 2006. All written comments were considered during preparation of the *Final General Management Plan and Environment Impact Statement*, in accordance with the requirements of Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (40 CFR 1503). The comments allow the planning team, National Park Service decision makers, and other interested parties to review and assess the views of other agencies, organizations, businesses, and individuals related to the preferred alternative, the other alternatives, and potential impacts. Selection of the preferred alternative and revisions to the alternative are not based on how many people supported a particular alternative.

Substantive comments have been summarized and responses provided; where necessary, changes to the draft plan have been made. Comment letters from all federal, state, and local governments, as well as businesses, private organizations, and individuals who made substantive comments are reprinted. In some cases, due to public interest on a particular issue, a representative sample of comments is reproduced. Comments simply expressing a preference for an alternative or an action within an alternative did not receive a response; neither did questions and comments that did not directly address issues relevant to the general management plan.

The Council on Environmental Quality regulations for implementing the National Environmental Policy Act require that the National Park Service respond to substantive comments, which are defined in Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision-making Handbook* (NPS 1999), as those that do one or more of the following:

- (a) question, with reasonable basis, the accuracy of information in the environmental impact statement
- (b) question, with reasonable basis, the adequacy of environmental analysis
- (c) present reasonable alternatives other than those presented in the environmental impact statement
- (d) cause changes or revisions in the proposal.

In other words, substantive comments raise, debate, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with National Park Service policy, are not considered substantive.

RANGE OF COMMENTS

The National Park Service received approximately 500 comments on the draft plan by mail, e-mail, fax, hand delivery, oral transcript, and the Internet. A number of groups and individuals submitted duplicate comments by different means, and several people commented up to three times. Eight letters were from American Indian tribes; two tribes commented twice. Of the comments received, 16 were from agencies and elected officials, 48 from organizations, and 13 from businesses. The remaining comments were from individuals. Approximately 637 additional individuals responded by using one of seven different form letters. Approximately 827 individuals signed one of three petitions. The public comment period began June 15, 2006. The original 90-day public comment period was extended by 15 days; with that extension, the comment period ended on September 30, 2006.

In August 2006, nine open house public meetings were held to summarize contents of the draft plan, to provide information on what constituted substantive comments, and to encourage public comment. There were approximately 253 participants. Meetings were held in Sequim (16 participants), Seattle (45), Shelton (29), Silverdale (22), Port Angeles (70), Sekiu (26), Amanda Park (40), Port Townsend (21), and Forks (24).

The following topics received the most comment:

- **Access to Park Facilities** — Some commenters questioned the ability of the Park Service to maintain public access to facilities while protecting resources, such as rivers and floodplains. Other commenters supported maintaining the existing access roads. Some commenters questioned the need to relocate Highway 101 at Kalaloch.

- **Boundary Adjustments** — Numerous comments were received on the proposed boundary expansions, ranging from opposition to any boundary adjustment to support for more extensive boundary adjustments as included in alternative B. Some commenters questioned the need for boundary adjustments considering the existing federal and state regulations and guidance. Some requested more information related to the evaluation of impacts, including area natural resources (e.g. fisheries, elk, habitat), how the Park Service would improve management of these resources, how the Park Service would manage roads in the area, and how the Park Service could afford to manage more lands in the park. The socioeconomic effects to the region were questioned. Commenters also questioned the estimated costs of the boundary adjustments and the effects to private property owners.
 - **Management Zoning** — Several commenters were confused over the definitions of the zones within the park and how frontcountry and wilderness zones were designated, and what changes, if any, would be caused by such designation.
 - **Olympic Hot Springs** — The park received many form letters and individual comment letters about potential restoration of the Olympic Hot Springs as it is one of the last remaining natural hot springs areas in the state of Washington. Commenters provided options and ideas to improve conditions of the hot springs.
 - **Ozette Lake** — Many commenters had concerns about access to, facilities at, and motorized use on Ozette Lake. Commenters expressed various opinions: they opposed any restrictions of motorized use on the lake, they supported some level of restrictions such as horsepower limits, or they supported restricting all motorized use. Commenters were concerned about the facilities around the lake, and access to the lake and to private property.
 - **Partnerships** — Several commenters asked that the section on partnerships be expanded to clarify the park's intent to establish partners with local and regional communities, groups, tribes, and others.
 - **Rivers and Floodplains** — Several commenters had concerns related to the location of existing roads and facilities in floodplains, and the differences between the current management strategies and proposed management strategies. Some commenters wanted the desired conditions and strategies to be clarified.
 - **Socioeconomic Resources** — Several commenters provided updated information for inclusion in the document and the analysis of the region's economy.
 - **Tribal Comments** — Area tribes who commented on the plan were concerned with how treaty rights and trust resources were addressed in the plan; they also expressed concerns over access to traditional lands, protection of natural resources (e.g. rivers and floodplains, native species), boundary adjustments and impacts to tribal treaty rights, jurisdiction, protection of ethnographic resources, employment opportunities, government-to-government consultation, partnerships, and how to improve relationships with the park.
 - **Visitor Use: Stock Use Opportunities** — Many commenters were concerned about the potential for future closures of existing stock trails and limits on stock use that would occur under the preferred alternative.
 - **Wilderness Management** — There were questions and concerns related to how Olympic National Park would manage wilderness resources; whether cultural resources should be maintained in wilderness, concerns about administrative structures in wilderness, and questions about wilderness zoning. Many commenters asked the Park Service to clarify what it means to conduct a wilderness suitability study. Many people requested more information on when a wilderness management plan would be developed.
- Other comments included concerns related to accessibility, air quality, air tours and overflights, park budget and budget priorities, climate change, consultation and coordination during the planning process and in the future, costs of implementing the preferred alternative, cultural resources management, education and outreach, facilities management, fisheries resources, geologic processes, habitat, night sky, references, soundscape management, those topics that were dismissed from further analysis (e.g. environmental justice, unique farmlands), vegetation, visitor use, water resources, wild and scenic river studies, and wildlife management (native, extirpated, and non-native species).

There were several alternatives or modifications to the existing alternatives suggested by commenters. Some of the suggestions were already addressed as components of alternatives B, C, or D including the following:

- keep developed areas at their current size
- keep trails open to stock use
- keep camping facilities open at Rayonier and Swan Bay
- explore alternative transit options
- build a trail bridge at Queets
- designate river zones
- close the downhill ski area on Hurricane Ridge
- expand the downhill ski area on Hurricane Ridge
- encourage crossing country skiing as a winter activity
- improve/close the Obstruction Point Road
- improve/close the Dosewallips Road
- allow motorized use on Ozette Lake
- keep Deer Park Road open year-round
- close all roads in the park and expand the wilderness
- keep all roads open
- do not maintain problem roads
- move the Hoh Visitor Center
- construct a visitor center in the Quinault Area
- do not expand concessions facilities
- retain facilities at Kalaloch only if it can be done without damaging the environment
- work with partners, other agencies, and tribes to develop new camping and facilities outside the park boundaries
- expand and improve camping and other facilities inside the park boundaries
- close camping facilities and convert areas to day use
- work with the U.S. Forest Service to develop standards for the long-term protection of the Lyre River and Lake Crescent

Many commenters combined various components of each alternative to come up with a slightly modified alternative (e.g. identify options for boundary adjustments and land acquisition, create a middle ground alternative between alternative B and D).

Some commenters requested alternatives that were too detailed for the plan, were outside the scope of the general management plan, were considered in other plans, or could be achieved through other methods outside the general management plan process. The following are examples of some of these comments:

- keep roads and campgrounds open as much as possible in the lower elevation areas
- remove interpretive signs at Royal Lake
- provide interpretive exhibit at Rialto Beach
- restore historic geographical names to beach trails
- provide more information on natural soundscape in park programs and on interpretive displays and maps
- provide more interpretation on the restoration of the Elwha River
- designate “tent only” loops in park campgrounds
- install covered picnic areas in rainy areas, like Mora and Hoh
- open the tunnels along the Spruce Railroad Trail
- better manage South Beach Campground
- eliminate all beach fires
- construct bicycle lane in Quinault area
- provide trash receptacles and restrooms at trailheads
- complete a sound survey of the park
- enlarge the Third Beach trailhead parking lot
- restore species like the wolf and the fisher

Some comments were more relevant to implementation plans, provided site specific ideas that would be used in future planning efforts, or would be more appropriately addressed through the regulation and rulemaking process (e.g. prohibit landing of watercraft on the islands of the Washington Islands National Wildlife Refuge, add a hiking/biking route along Highway 101 at Kalaloch, consider options for the management and restoration of Olympic Hot Springs, add a floating boat dock at Swan Bay, establish a no-wake zone on Ozette Lake, require electric motors on park nonwilderness lakes, use a “green” method of erosion control at Kalaloch to protect the lodge).

There were numerous comments related to wilderness use and permitting that are more appropriate for the wilderness management plan process, including but not limited to the following:

- allow use of goats and llamas as pack animals
- institute a lottery system for wilderness permits
- restrict stock use during wet conditions
- remove permanent ranger stations in wilderness
- do not implement wilderness zoning
- improve selected trails
- provide more trailheads
- develop a wilderness shuttle system (including a boat transport service and trailhead shuttle)
- provide more information on wilderness trailhead signs
- consider a trail hut system for winter use in wilderness
- provide adequate stock facilities at trailheads, including pull through spaces designated for trailers, hitching posts, and manure bins
- charge fees for backcountry hikes and climbs to cover potential rescue costs

Some commenters presented alternatives that are not reasonable, provided information that was not related to the issues or was outside the scope of the general management plan, presented personal opinions or grievances, or presented alternatives that are outside the jurisdiction of the National Park Service (e.g. build a road between Forks and the Hoko Road, build an aerial tram to Hurricane Ridge and Sol Duc, build a trail along the Heart O' the Hills Parkway, build a trail on the south side of the Dosewallips River, return park lands to the state or county or tribes). These comments were dismissed from the planning process.

Editorial comments correcting grammar and spelling errors were received. Editorial changes have been incorporated into the final plan where appropriate.

CHANGES AND CLARIFICATIONS TO THE DOCUMENT

Several suggestions were included in the final preferred alternative. A commenter suggested

instituting an overnight permit system for parking at Swan Bay so lake users, including private property owners, could park overnight at that location. Several commenters suggested keeping Rayonier Landing open for day use only. Both of these ideas were included in the final preferred alternative.

Some agencies, tribes, and communities requested increased partnering to improve visitor education and opportunities and collaborative cultural and natural resources management. This suggestion has been included in the final plan.

Changes made to the *General Management Plan / Environmental Impact Statement* as a result of public comments are summarized below. This list does not include all the changes made to clarify points, provide additional rationale for decisions, or correct minor errors or omissions.

- Boundary adjustment alternatives have been modified slightly and clarified.
- Potential costs for property acquisition have been clarified.
- Information on private property access rights has been included.
- The wilderness and cultural resources sections have been updated based on changes in National Park Service management policies.
- The section on partnerships has been expanded.
- Socioeconomic information has been updated.
- Visitation information has been updated.
- Language has been revised to clarify frontcountry zone descriptions.
- Wilderness zoning definitions remain within the plan but the exact on-the-ground designation has been removed from the plan and will be delineated through the wilderness management plan process.
- Stock use issues have been clarified.
- Laws and policies governing use of park resources by Native Americans have been added to "Laws, Regulations, Servicewide Mandates and Policies."
- Desired conditions and strategies under "Parkwide Policies and Servicewide Mandates" have been updated or clarified for 15 topics.

LIST OF COMMENTERS

The following is a list of federal, state, and local governments; Indian tribes; interest groups and organizations; and businesses that provided comments on the draft plan. These comment letters are included in this volume. Names of private citizens are not included in the list, and due to the extensive number of comment letters, are not included in the final volume. Copies of the letters that are required for inclusion are in the section following the “Substantive Comments and Responses” section. Copies of all letters are

available in electronic format, with individual names and addresses removed, and are available upon request.

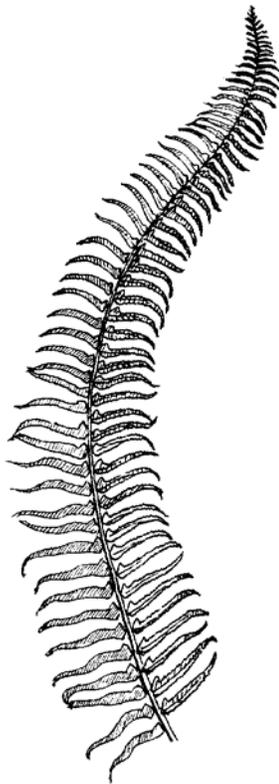
NOTE: Letters are numbered by the National Park Service Planning, Environment, and Public Comment (PEPC) system and are part of a nationwide database; therefore, the numbers are not in chronological order. (The comment letters in this document are also not in this order.)

PEPC ID	Park Code	Commenter
Federal, State, and Local Governments		
499	191017	City of Forks
546	191178	City of Port Angeles
502	191020	Clallam County Commissioner Mike Doherty
424	190922	Environmental Protection Agency
19	188328	Hurricane Ridge Public Development Authority
561	191198	Jefferson County
457	190955	Olympic Coast National Marine Sanctuary
265	190701	Olympic Region Clean Air Agency
453	190951	Port of Port Angeles
331	190808	Queets Clearwater School District
577	191218	Quillayute Valley School District
439	190937	Representative Jim Buck
485	191003	Representative Lynn Kessler
442	190940	United States Forest Service
456	190954	Washington Department of Natural Resources
17	188326	Washington Department of Transportation
299, 455	190737, 190953	Washington State Historic Preservation Office
Indian Tribes		
351	190829	Hoh Indian Tribe
598	203140	Makah Tribe
531	191162	Port Gamble S’klallam Tribe
311, 534	190788 191165	Quileute Indian Tribe
356, 548	190835	Quinault Indian Nation

PEPC ID	Park Code	Commenter
	191180	
477	190944	Skokomish Indian Tribe
Businesses		
269	190705	Aramark Lake Quinault Lodge
284, 285	190721, 190722	FineLine Press
441, 547	190939 191179	Green Crow Corporation
451	190949	Interfor Pacific
234 and 235	190650 190651	Lazelle Nature Photography (text is same for both letters)
260, 396, 427	190696 190888 190925	Merrill & Ring
529	191159	Portac, Inc.
562	191199	Rayonier
440	190938	Rochelle Environmental Forestry Consulting
426	190924	Seacrest Land Development Corp.
345	190822	Snolsle Natural Foods
540	191171	Solduc Valley Packers
123	189431	The May Valley Company
Interest Groups and Organizations		
22	188363	American Forest Resource Council
349	190827	American Rivers
8, 498	191016	American Whitewater
Numerous Letters Received 565, 566, 584, 533		Backcountry Horsemen of Washington
470	190977	Bellingham Bares
552	191188	Clallam Bay Sekiu Advisory Council
281	190718	Clallam Bay/Sekiu Chamber of Commerce
462	190960	Clallam Economic Development Committee
327	190804	Conservation Northwest
255	190683	Evergreen Packgoat Club
25	188464	Forks Chamber of Commerce
315	190792	Friends of Miller Peninsula State Park
526	191156	Hood Canal Environmental Council
503	191021	Howard County Bird Club

PEPC ID	Park Code	Commenter
279	190716	Hurricane Ridge Winter Sports Club
563	191200	Juan De Fuca Scenic Byway Association
262	190698	Llama Ladies
458	190956	The Mountaineers
191	190535	National Audubon Society
505	191023	National Outdoor Leadership School Pacific Northwest
454	190952	National Parks and Conservation Association
353	190832	Naturist Action Committee
300	190739	North Cascades Conservation Council
478	190995	National Coast Trail Association
544	191176	North Olympic Peninsula Visitor and Convention Bureau
445	190943	North Olympic Timber Action Committee
370	190852	Olympic Coast Alliance
317	190794	Olympic Environmental Council
292	190730	Olympic Forest Coalition
321	190798	Olympic Park Associates
203	190549	Olympic Peninsula Audubon Society
305	190764	Pacific Northwest Trail Association
589	191243	Peninsula Citizens for the Protection of Whales
543	191175	Port Angeles Business Association
596	191258	
208	190555	Port Angeles Regional Chamber of Commerce
316	190793	Public Employees for Environmental Responsibility
528	191158	Seattle Audubon Society
593	191255	Sequim-Dungeness Valley Chamber of Commerce
449	190947	Society for American Foresters, North Olympic Chapter of American Foresters
435	190933	Washington Forest Protection Association
237	190662	Washington Native Plant Society
461	190959	Washington Wilderness Coalition
501	191019	The Wilderness Society
504	191022	Wilderness Watch
Form Letters and Petitions		
218	190606	American Rivers — Form Letter — 250 Received
391	188557	Backcountry Horsemen — Petition — 79 Signatures
530	191160	Citizens of Clearwater Community — Petition — 17 Signatures

PEPC ID	Park Code	Commenter
325	190802	Conservation Northwest — Form Letter — 154 Received
210, 215	190951	Friends of Lake Ozette Petition — 731 Signatures
42	188604	National Parks and Conservation Association Form Letter — 233 Received
169, 187	190448 190531	Naturist Action Committee Form Letter — 19 Received



SUBSTANTIVE COMMENTS AND RESPONSES

Substantive comments from the letters are extracted below. A concern statement has been developed to summarize the comment, but representative quotes are also included from the original letters, edited only for style consistency and spelling. All comment letters from agencies, tribes, organizations, and businesses have been scanned and are included in this volume.

Where appropriate, text in the *Final General Management Plan* has been revised to address comments and changes, as indicated in the following responses. Unless otherwise noted, all page number citations refer to the *Draft General Management Plan*.

ACCESS

Access and Alternative Access Routes

Comments: Please address the following specific issues:

- Assess the existing access routes and identify areas at risk due to flooding, river migration, geologic stability, and other factors;
- Identify appropriate alternative routes for relocating these roads;
- Identify appropriate agencies responsible for the design and construction of alternative routes and the ongoing maintenance and repair of park access roads; and
- Identify federal funds for relocation, maintenance, and repair of these roads.

Response: The general management plan establishes the park's overall goals, desired conditions, and strategies for protecting resources while allowing continued access into the park. Follow-up implementation plans, including river restoration plans and road management feasibility studies and plans, would be developed in the future to address these specifics (page 81).

Coordination with interested parties, including state, county and local governments, and tribal governments, would continue to occur throughout this process. This has been clarified on page 41 of the *Final General Management Plan* under “Access to and Around the Park.”

Comment: Additional roads and road-related facilities should not be added without first completely decommissioning current roads.

Response: Follow-up implementation plans would address how and when roads would be relocated or decommissioned and would include opportunities for public review and comment. It is likely that road relocation and decommissioning would be a phased approach to allow continued access into the park.

Alternative Transportation

Comment: Changes in visitor trends may result in decreased backcountry use and increased road-based recreation, including substantially increased motor home traffic. This trend would support intensified front country development, but Chapter 3's discussion of Alternative Transportation (pages 161-162) addresses only the present condition and fails to address future needs of the park.

Development strategies in the preferred alternative ought to address park visitation and access options that extend farther into the future—into what is likely to be seen as the age of ever increasing fuel costs—and directly address the option of scheduled transportation carrying an ever increasing share of the access. This would directly and beneficially affect the safety of bicyclists on paved roads in and around the park and the resident front country animals.

Response: Under the preferred alternative, connections to regional multimodal transit providers would be coordinated to improve access to Hurricane Ridge (M4, 4.). Alternative methods of transportation are included in the alternatives for Hurricane Ridge (see page M4). Optional seasonal transit systems would be studied, and implemented if feasible, for both Sol Duc and the Hoh. (See pages M19 and M32.)

Comment: Any park transit or regional transit authority would have to be accessible to comply with U.S. Department of Transportation accessibility standards. A system of private, tour guides would be preferred to serve persons with disabilities and their companions.

Response: The commenter is correct. The National Park Service will comply with existing laws, regulations, and accessibility standards if an alternative transit system is developed. These laws are referenced on page 11 under “Laws, Regulations, and Servicewide Policies and Mandates” and on page 33 under “Parkwide Policies for Visitor Use and Experience.”

The National Park Service is open to the concept of private tours for disabled visitors. Individuals and groups interested in providing private tour opportunities to serve persons with disabilities should contact the park’s concession management office for information about applying for authorization to operate within Olympic National Park.

Comment: Limit the number of private vehicles on Hurricane Ridge in the winter. The plan should call for an evaluation of the feasibility of a bus type shuttle system between the Olympic National Park Visitor Center and Hurricane Ridge.

Response: Private vehicle use is limited in winter based on available parking; when lots are full, visitors are stopped at the entrance gate at Heart O’ the Hills.

The Hurricane Ridge Winter Sports Club works with area partners (e.g. City of Port Angeles, Port Angeles School District) to provide limited transit between January and March (on the same schedule as the ski school) as stated on page 162. In addition, the General Management Plan preferred alternative (pages M4, 4) includes coordination with regional multimodal transit to improve access and calls for studying opportunities to establish a transit system.

Comment: The transit system does not mention what would be the protocol for tribal members in accessing the area. Would they be allowed to access areas by vehicle that tourists would not?

Response: The preferred alternative calls for transit studies to be conducted in several areas of the park to determine whether or not a transit system would be feasible. If a transit system were found to be feasible, the Park Service would work closely with area tribes to make sure that access for area tribal members continues. Olympic National Park will be working with tribes to address specific tribal access issues in government-to-government consultations.

Closed Roads

Comments: Reopen closed roads (Dosewallips and Queets)

The Park Service should engage the U.S. Forest Service in identifying alternatives to reopening the Dosewallips Road. For example there may be an opportunity for the National Forest to provide parking on the downriver side of the washout and the National Park Service to maintain a transit/bus on the upriver side to ferry park goers.

Response: The preferred alternative (pages M52 and M40) includes restoring vehicular access to the Dosewallips and the Queets. The National Park Service and U.S. Forest Service are currently working to restore vehicular access into the Dosewallips area and a draft environmental impact statement with alternatives for restoring access into Dosewallips should be released by the time the *Final General Management Plan* is published.

The National Park Service is working with the U.S. Forest Service and the Washington Department of Natural Resources to restore interim access to the upper Queets Valley by using existing roads to provide an alternative route. Vehicle access into the upper Queets should be restored by the time the *Final General Management Plan* is published.

Coordination with Transportation Agencies

Comment: Proposed actions to maintain access within the park would be negated if county roads providing access to the park are damaged or destroyed and the counties are unable to repair or relocate them.

Response: The National Park Service will continue to work cooperatively with federal, state, and county transportation agencies to facilitate vehicular access into the park. This information has been updated on page 54 of the *Final General Management Plan*.

Highway 101 Relocation

Comments: How would the Washington Department of Transportation deal with the expense of relocating Highway 101 near Kalaloch? Removing Washington Department of Natural

Resources forests for this new highway would rob money from our schools, and would pollute many salmon and steelhead streams.

The proposed relocation of the portions of Highway 101 in the Kalaloch area would include Department of Natural Resources trust lands that would potentially be significantly impacted as part of the proposal.

Any relocation of Highway 101 to the east would result in highway construction through forested wetlands and marbled murrelet habitat near Cedar Creek.

The cost to move Highway 101 out of the park would be prohibitive; moving the highway would cause more environmental damage; the private land required to move the highway would cause more hardship for landowners and the state.

For the relocation of Highway 101 near Kalaloch, consider upgrading the network of logging roads that run generally parallel to the beach from near Queets to just outside the north boundary or Nolan Creek.

Response: This information is clarified on page 119 in the final plan to allow the National Park Service to work with the state to seek alternative road corridors for portions of U.S. 101 should coastal erosion or a catastrophic event damage the roadway and repair in place is not feasible.

Under the preferred alternative as shown on page M36 and on page 81 under “Future Studies and Implementation Plans” the National Park Service would work with the state to complete a feasibility study for relocating portions of U.S. Highway 101. An implementation plan would also be developed and would include strategies for integrating the Highway 101 relocation project into the state road priority and funding listing.

The feasibility study would examine potential effects of road relocation on forested wetlands and other area resources such as habitat for marbled murrelets, salmon, and steelhead. This level of detail is appropriate within an implementation plan and is outside the scope of the general management plan.

Comment: The Hoh Tribal members need to have vehicle access to the clam beaches for subsistence gathering year round. As mentioned previously, any cedar logs or other cultural use materials generated

by new campgrounds, roadways, or structure relocation should be offered to the Hoh Tribe for salvage before they are put to other uses. One must seriously question the desire of the Olympic National Park to have Highway 101 re-routed to the east of Kalaloch, especially since members from several tribes will still need vehicle access to the trails leading to the various beaches. There are presently fish passage problems related to Highway 101 in the immediate vicinity of Kalaloch that need to be addressed. These problems might be considered insignificant to what might take place if Highway 101 was moved to the east.

Response: Existing access to beaches will not change as a result of the plan. Even with the proposed relocation of a portion of Highway 101 near Kalaloch, under the preferred alternative, roads will still exist in order to maintain access by tribal members and visitors (page M36). Vehicles are currently not allowed on park beaches, or any other off-road area. This has not changed in the *General Management Plan*.

However, some roads or portions of roads may be moved and former roads may be decommissioned for the protection and restoration of park resources near rivers and floodplains. Therefore, access in those areas, in the future, may be by walking or boat only. As feasibility studies and implementation plans are developed, the National Park Service will continue to consult the tribes on a government-to-government basis to address tribal concerns.

Although the section of Highway 101 near Kalaloch is within Olympic National Park, it is under the legal jurisdiction of the Washington State Department of Transportation. However, the Park Service will certainly work cooperatively with the state and the tribes to identify and repair any fish passage problems. Further, the *General Management Plan* as written will allow for any necessary repair of fish passage problems, based on desired future condition statements.

Comment: The by-pass would most likely have to be built through the upper watersheds of Sand, Cedar, Steamboat, Kalaloch and a number of other smaller streams. Portions of the road would have to be constructed on unstable slopes and through wetlands and riparian areas. There would also have to be countless stream crossings. Re-locating Highway 101 to the east of Kalaloch could be viewed as a classic example of two wrongs not making a right and the end result would be a net loss

in habitat within the Hoh Tribe's "Usual and Accustomed Areas."

Response: Before any decision is made regarding the road relocation, a study would be completed, as stated on page 81 of the *Draft General Management Plan*. The study would include gathering information about the most at-risk locations along the existing Highway 101 roadway and places where potential road relocations would be possible. The Park Service would work closely with area tribes during development of this study. If portions of the road are determined to be at risk, government-to-government consultations would be conducted with area tribes, and public participation would be invited as part of the development of a separate implementation plan for road relocation.

Impacts from Road Maintenance

Comment: How much damage occurs from maintenance of the Obstruction Point road?

Response: Impacts from existing maintenance of park roads were considered in the cumulative effects sections of the *Draft General Management Plan*. The environmental consequences of maintaining the existing road (alternative D) at Obstruction Point are minor to moderate soil compaction on the existing roadway (page 317), negligible to minor adverse impacts to air quality (page 311), minor effects to wildlife and wildlife habitat from habitat loss and disruption associated with park and visitor activities (page 320), and moderately beneficial effects to visitation (page 328).

Other access options for Obstruction Point analyzed within the general management plan included alternative B, converting the Obstruction Point Road to a trail (pages 6 and M6) and alternative C, paving the road (pages 6 and M7).

ACCESSIBILITY

Comments: The current lack of access into the interior of Olympic National Park discriminates against the elderly, the disabled, and others who do not have the ability to hike long distances into the wilderness.

There is too much emphasis in the plan on making the park universally accessible.

The number of mobility challenged park users will increase steadily, and more frontcountry trails will need to be upgraded to meet accessibility standards if these visitors are to be retained. This general shift is likely to continue throughout the life of the general management plan and defining more precisely the range of options that could become available to retain these potentially lost visitors as active park users and supporters is a problem that should be addressed more directly in the preferred alternative.

Response: The National Park Service has a legal obligation to make equal opportunities available for people with disabilities in all programs and activities as referenced on pages 11 and 33 of the *Draft General Management Plan*. Road access and trails that are "accessible with assistance" are provided in a number of areas, giving people the chance to experience the high country (at Hurricane Ridge and Deer Park; the rain forest, at the Hoh and Quinalt areas and the coast, at Rialto Beach). Upgrading some frontcountry trails to accessibility standards is included in the general management plan. In addition, the beginning portions of a number of wilderness trails can be accessed by persons using a wheelchair. Accessibility inspections of park facilities will be carried out within the next two years and will provide detailed information and work orders for making accessibility improvements.

Access in wilderness must be balanced with the intent of the wilderness laws to provide the highest level of protection to the wilderness resource (National Park Service "Wilderness Policies," DO-41). The opportunity to explore wild lands is available to people in varying degrees. However, by its very nature, wilderness is not readily accessible to all people and offers some visitors greater challenge and risk than others. Olympic National Park seeks ways to provide opportunities for physically impaired individuals to enjoy wilderness, while preserving wilderness resources and character.

Comment: Page 140 of the draft plan states that "Visitors with mobility disabilities have access to educational and lodging facilities, nine developed campgrounds, and two very short interpretive nature trails." Recent onsite investigation shows that this is not true.

Response: Although accessibility may not be at the ideal level, significant improvements to Olympic

National Park facilities have been made over the last thirty years in efforts to comply with the Architectural Barriers Act of 1968 and the Uniform Federal Accessibility Standards first issued in 1984. Similar efforts have been made in recent years to comply with the Final Report on the Recommendations for Accessibility Guidelines for Outdoor Developed Areas, developed for the U.S. Architectural and Transportation Barriers Compliance Board and dated September 1999.

However, more work is needed to bring facilities into full compliance. Under National Park Service desired conditions for Visitor Use and Experience (page 33), there is a goal to provide, where feasible, programs, services, and facilities to all people, including those with disabilities. The National Park Service has recently developed guidelines on performing accessibility inspections. The accessibility inspections will result in detailed work orders for making facility modifications. The National Park Service anticipates that these inspections will be performed at Olympic National Park within two years.

In the meantime, several projects to improve accessibility are planned at the Olympic National Park Visitor Center in Port Angeles, including modifications to the sidewalks, restroom approaches, and the restrooms themselves. Seating in the visitor center theater was recently modified to provide additional space for wheelchair users.

Comment: Number 6 on page M16 refers to a "universally accessible frontcountry trail." Does this refer to the Spruce Railroad Trail or does this indicate an additional trail?

Response: This statement refers to the Spruce Railroad Trail, which will be extended west as part of planned improvements by Clallam County to make this trail part of the Olympic Discovery Trail. When complete, the Olympic Discovery Trail will lead from Port Townsend to Port Angeles and then west to the Pacific Coast.

Comment: We are uncertain how a universally accessible frontcountry trail could be developed without designating additional area as either "development zone" or "day use."

Response: As stated on Table 1 on page 61; low use zones can include universally accessible trails.

Lake Ozette and Accessibility Standards

Comment: Restricting motorized access on Lake Ozette would restrict access and recreational opportunity for the elderly and handicapped.

Response: Current accessibility standards do apply to trails and facilities, but do not address motorized use on lakes. In September 1999, the Regulatory Negotiations Committee published a document titled "The Final Report on the Recommendations for Accessibility Guidelines for Outdoor Developed Areas for the U.S. Architectural and Transportation Barriers Compliance Board." The recommendations have not become law and still do not speak to the subject of motorboats providing access in situations such as the existence of private property on Lake Ozette.

However, any limitations or restrictions regarding use of boats with motors would be developed with the participation of area tribes, private property owners, and recreational users at Lake Ozette as part of the process to develop a Lake Ozette Management Plan. This plan has been added to page 81 under "Future Studies and Implementation Plans Needed."

AIR QUALITY

Comment: What connection is there between Interstate 5 related air quality impacts and vehicle use within Olympic National Park?

Response: A description of Olympic National Park air quality is found on page 96 of the plan.

Olympic National Park has neither quantified emissions nor studied local impacts from vehicle use within the park. Similarly, the relative contribution of pollution or other effects from vehicles within Olympic National Park and vehicles on Interstate 5 has not been specifically studied or quantified.

However, based on studies done elsewhere, we know impacts are possible to vegetation growing immediately beside heavily used roadways in the park, such as Highway 101, as some kinds of air pollution (e.g., ammonia from catalytic converters) quickly settle out of the air after being emitted.

Emissions from traffic on Interstate 5 are so large that they have a significant impact over the entire

region, including Olympic National Park. This is especially true for ozone pollution (smog) which forms downwind of emission sources such as Interstate 5 and can stay in the atmosphere for long periods. Particle pollution from Interstate 5 can also travel long distances and degrade visibility in Olympic National Park. Finally, oxides of nitrogen from vehicles react in the atmosphere and are transported long distances.

Comment: Under "Air Quality" and "Strategies," possibly include natural quiet management under air quality management.

Response: The National Park Service considered this comment and determined that desired conditions and strategies for soundscapes are covered in detail on page 14; consequently, there is no need to add this information to the air quality management section.

AIR TOURS AND OVERFLIGHTS

Comments: Park staff may seek remedies for noise intrusions that originate outside the park. For example, park staff can petition the Federal Aviation Administration or individual airlines to avoid routes that produce adverse noise impacts on natural soundscapes or degrade natural quiet.

The National Park Service should create a moratorium on air tour management plans (ATMP) and cease operation of any air tours until a sound survey can be completed. A sound survey is needed to define the resource that is to be managed.

Response: The National Park Service Air Tour Management Act (2000) requires anyone operating or intending to operate commercial air tours to apply to the Federal Aviation Administration (FAA) for authority to conduct such tours. The Act further requires the FAA, in cooperation with the National Park Service, to develop an Air Tour Management Plan (ATMP) for each unit of the National Park System or tribal land that does not have an ATMP in place when someone applies for this authority. The ATMP will provide acceptable and effective measures to mitigate or prevent significant adverse impacts, if any, of commercial air tour operations on natural and cultural resources, visitor experiences, and tribal lands.

Olympic National Park has been identified as having commercial air tour operations that may be subject

to regulations of the Act; development of an ATMP is included on page 81, under "Future Studies and Implementation Plans Needed." However, it is not likely that an ATMP would be initiated in the near future, based on the current schedule of ATMPs in the National Park Service. As part of the ATMP, the National Park Service would seek funding to conduct baseline sound surveys in the park.

BOUNDARY ADJUSTMENTS

Appendix B — Analysis of Boundary Adjustments

Comment: Some of the boundary expansions in alternative D are smaller than those described in alternative C. There is no discussion of the trade-offs or reasoning behind the selections for alternative D.

Response: Different alternatives looked at different options for land protection and boundary adjustments. Alternative C only includes the boundary adjustment at Ozette. The National Park Service considered the preferred alternative to be the most feasible and reasonable option to protect the core values of Olympic National Park.

Comment: There is no specific evidence offered to show the necessity for additional land acquisition.

Response: In accordance with National Park Service policies, and as stated on page 34 and appendix B of the *Draft General Management Plan*, the National Park Service will identify and evaluate potential boundary adjustments and may seek boundary revision through the planning process. The National Park and Recreation Act of 1978 requires the National Park Service to consider boundary adjustments in the course of general management planning efforts. Appendix B has been updated with more information to justify the need for boundary expansions.

Cost of Boundary Adjustments

Comment: How can the Park Service financially manage an additional 56,000 acres?

Response: The boundary adjustments called for in the *Draft General Management Plan* total approximately 16,000 acres at Ozette, Queets, and Lake Crescent. These would be managed for habitat

and resource protection and would have minimal, if any, infrastructure needed. The intent is that additional lands would remain in a natural condition and therefore require little in terms of additional operational funding. However, the commenter is correct in that substantial funding would be required to actively restore these lands (e.g. restoring former roadbeds and accelerating restoration of forest structural characteristics). The Park Service would seek grants and funding to restore these lands to protect park resources.

The remainder of the acreage proposed for acquisition (from willing sellers only) totals approximately 44,000 acres. This land would not be incorporated into the park boundary, but instead would be used in trade with the state for an extinguishment of state-owned, subsurface mineral rights throughout the park. The state would then manage this land and the Park Service would not incur additional financial responsibilities for management of this land.

Comment: Page 64 of the *Draft General Management Plan* says that the *Olympic National Park Business Plan* identified \$6.6 million in unmet needs parkwide, and that the park staff has since had a reduction of 30 full time employees. Is it prudent to think that adding additional land to an already over extended and currently unfunded budget is a fiscally sound move?

Response: See previous comment. Under the preferred alternative, 16,000 acres will be included within the park boundary, but the lands would be purchased only through the willing seller process. This is clarified on pages 41-47 of the final plan and in appendix B. Many of the costs associated with park management are associated with facilities, and the lands proposed for addition are not planned for facility development. There would be some costs incurred from the initial assessment of the acquired lands, followed by the development of a strategy for managing these lands. This strategy would likely include the seeking of funds for restoration of the acquired lands.

Comment: The City of Forks requests, that, pursuant to the Information Quality Act, table 2's costs estimates for "Land Protection/Boundary Adjustments" be reevaluated for accuracy and objectivity, the data used to determine the total amounts provided for each of the four alternatives be shared with the public, and if necessary, peer review of such data be conducted to ensure its

accuracy, reliability and objectivity. It also appears that the projected costs of the land acquisition/boundary adjustments lack significant quality, reproducibility, and reliability to be relied upon.

Your document grossly underestimates acquisition costs, by at least five times the estimate. Recent transactions of timberland property indicate prices of \$2,500 per acre or higher, which translates into \$150,000,000 for 60,000 acres, or over five times the park's estimate.

From the materials, some of which was redacted, obtained by the City pursuant to a Public Disclosure Act request in July 2006, it appears that approximately one third of the Bite Hill parcel has recently (+/- <5 years) been harvested. An associated document, provided pursuant to the City's request of the Washington Department of Natural Resources, notes that some harvest could be done within this stand pursuant to the *Habitat Conservation Plan* that could generate approximately \$30,000 per year from harvesting just ten trees per year. See memorandum entitled "South Lake Ozette" parcel management plan for the Olympic Experimental Forest Dickodochtedar Landscape. The information in this memorandum seems to imply that the July 2005 estimate for the Bite Hill acreage is probably at the lower end of the value scale. However, just using that 2005 estimate found within the 05-07 *Trustland Transfer Land & Timber Values*, a figure of \$6,281 per acre would be an appropriate estimate for the Ozette region.

The data associated with the alternatives as summarized in Table 2 is inaccurate. Recent transactions in western Clallam County have established a price for the purchase of commercial timber lands of at least \$2,500 per acre, making the Lake Ozette expansion much higher than the total figure noted in the table for land acquisition for the preferred alternative. In addition, recent Endangered Species Act Section 6 allocations from the USFWS, associated with Western Rivers and the Hoh River Trust, would indicate that conservation measures discussed through out the plan and the preferred alternative to protect viewscapes would cost approximately \$2,700+ per acre, For the most recent announcement, please see USFWS Press Release 06-109, "Secretary Kempthorne Announces \$67 Million In Grants To Support Land Acquisition And Conservation Planning For Endangered Species - Washington Grants Total More Than \$20 Million" (Sept 26, 2006).

Finally, the Department of Natural Resources' 2005 appraisal, and the summary of that document entitled *05-07 Trustland Transfer Land & Timber Values, for the Bite Hill Trust Land Transfer Project* appears to affirm the City's position that the National Park Service project estimates are unrealistic. Department of Natural Resources estimated the value of the 355 acres that make up the Bite Hill project as totaling \$2.23 million. These 355 acres are a small portion of the proposed Lake Ozette expansion proposed by National Park Service and are located to the immediate S/SW of the southern most point of the lake.

Response: The National Park Service used the best market information publicly available at the time the *Draft General Management Plan* was written. The cost estimate was done for comparison purposes only for evaluating alternatives, realizing that information will be updated in the future, and appraisals will need to be completed at the time of negotiations from willing sellers. In addition, the cost estimate was completed with the assumption that some of the land will be protected by easement and not by fee purchase, which will cost less than fee purchase. The National Park Service will perform a fair market value (FMV) appraisal at the time of negotiations with willing sellers. It is typical that prices will fluctuate and land and timber conditions will change during the interim before our acquisition, and the purchase price may not be representative of any preliminary estimates.

Until the final plan and final boundary recommendations are forthcoming in the record of decision, the National Park Service is unable to give a more accurate estimate of cost because there are a number of elements (e.g., details of potential land exchange with state of Washington, types of exchange, and land protection strategies) that will change in the future. After the general management plan is finalized, the National Park Service Land Resources Program Center will prepare a Legislative Cost Estimate (LCE) to provide a more accurate and detailed estimate of land acquisition costs according to the final approved plan, and this information will be provided to Congress prior to any legislation or appropriation.

Impacts to Park Operations from Boundary Adjustments

Comments: We believe that maintenance of existing infrastructure and improved visitor access

must be a higher funding and implementation priority than expanding Olympic National Park boundaries.

Spend the tax dollars that support the park on increased staffing, not on acquiring more nonwilderness areas in established communities.

Maintenance and operational budget would be spread out over a larger area [with a boundary adjustment]. Trails would be neglected and safety would become an issue.

There could be both short- and long-term adverse impacts to fish habitat and water quality resulting from lack of proper maintenance if the current budget shortfalls continue.

Response: Land acquisition funding is through the Land and Water Conservation Fund, which is obtained through oil and gas lease payments, not through income or property taxes. This funding source is completely different and separate from the appropriated funding for staffing, facilities, and other park operations.

While there would be more land included within the park boundaries primarily for wildlife and fisheries protection, land acquisition is not likely to affect the maintenance and operational budget because of the lack of existing and planned infrastructure and trails within the proposed acquisition areas.

Funding will be needed for implementation planning to develop strategies for managing and restoring these areas, and for the on-the-ground work. It is likely that the initial work will involve restoration projects and special grants will be sought to address those needs.

Fisheries and Water Quality Issues Related to Boundary Adjustments

Comment: How will Olympic National Park improve sockeye recovery potential by taking over jurisdiction? The plan doesn't specify how Olympic National Park, as the manager of expanded jurisdiction, will manage the lands, based on all aspects and not just natural resources, any better than the current land manager. The lack of direct efforts/projects by Olympic National Park since 1976 in recovery of the sockeye does not demonstrate any reliability that extension of

boundaries will result in sockeye recovery that equates to a higher level than the current land manager.

Response: Rather than jurisdiction, it is the ability to maximize cooperation and participation that provides potential for benefits to the resources. As stated in the clarified language on pages 41-47 of the final plan and in appendix B, expanding the park boundary will allow the National Park Service to expend funds in this area, work to improve resources, and work with our partners to improve sockeye recovery and watershed ecology.

In general, the lower reaches of all rivers are found to be the most productive and diverse riverine habitats: as the gradient decreases, there tends to be a commensurate increase in channel complexity. Protection and restoration of these areas within the proposed boundary expansion will ensure that, over time, fish habitat in these areas would recover to near historic conditions. Additionally, as the forest within the boundary area matures, ambient air temperature should decline, with the potential that temperatures of streams entering the lake will approximate natural levels.

Comments: The *Draft General Management Plan* has too many general statements concerning negative impacts of logging and related activities on fish habitat destruction. This is only a supposition or theory not based upon site specific research. Past logging practices may have impacted some streams but most have not. No evidence is presented on specific damage that has occurred in Olympic National Park from logging. Site specific studies in Alaska show that siltation and stream damage from road building and logging normally disappear in one year.

Modern logging practices do not adversely impact fisheries to any significant extent. Modern logging practices and approved timber management plans should be recognized as part of a forward looking document such as the *General Management Plan*.

There is no clear evidence to connect logging under current forest practices with degradation of spawning habitat.

Draft writers should either support this statement with proof or remove the offending language: "Recurring timber harvesting adjacent to the Ozette Lake shoreline could result in ...increase sedimentation and erosion of rivers and streams

that drain into Ozette Lake. Sedimentation has, and is expected to continue to have, severe adverse impacts on salmon spawning and survival in area tributary streams and river gravels"

Response: Commercial timber acreage within the proposed boundary expansion areas is currently managed either in accordance with Washington State forest practice rules developed under the 1999 "Forest and Fish Report," the 1996 Washington Department of Natural Resources (Department of Natural Resources) *Habitat Conservation Plan (Habitat Conservation Plan)*, and/or the *Forest Practices Habitat Conservation Plan (2006)*. The most beneficial components of these documents are the provisions for road construction and road maintenance. The new rules ensure that all stream crossings provide adequate protection for fish passage and that new road drainage systems minimize the potential for catastrophic road failure or delivery of sediment to streams. However, forest roads will continue to have an impact on the landscape, hydrology, and fisheries resources. The 1999 *Forest and Fish Report* recognizes that forest practices, and roads in particular, affect delivery of sediment to fish-bearing waters by allowing for an increase in sediment loading from old roads up to 50% above natural background levels (Schedule L-1). During summer low flows, this may be an insignificant increase. However, during winter storm conditions, a 50% increase in sediment loading could represent the delivery of a large quantity of material to spawning areas (Herrera, 2006) inhibiting fish reproduction.

The forest practice rules have also been modified to more fully address timber harvest in riparian areas. However, not all aspects of riparian function are protected under the existing forest practice rules. The rules provide standards for riparian buffers around fish-bearing and non-fish-bearing streams. Along non-fish-bearing (Type N) streams, a narrow 50-foot no-harvest buffer is only provided along the first 500 feet of the stream, or the first 50% of the stream for streams that are between 300 and 1,000 feet long. Beyond this distance, no buffer is required. Additionally, even in the protected riparian zones for both fish-bearing and non-fish-bearing streams, harvest may be allowed to facilitate an unrestricted number of road crossings and yarding corridors.

For example, the buffer requirements for these small Type N streams cause uncertainty regarding the potential sediment delivery to Lake Ozette.

Since sediment on the sockeye spawning grounds of the lake has been identified as a limiting factor for the recovery of sockeye (Jacobs et al, 1996; Haggerty et al, 2007), this uncertainty is cause for concern. According to the Department of Natural Resources stream database, there are approximately 350 lineal miles of rivers and streams in the Ozette Watershed. Of this, about 195 miles (more than 50%) are classified as type-N waters. Under the existing rules, approximately 110 miles of these streams (32% of the total known stream length in the watershed) could be left without any riparian timber buffer, not including areas needed for road crossings or yarding corridors. Although the type-N streams are usually quite small, and may be seasonal in nature, they can collectively contribute a large amount of sediment to the larger streams (and ultimately, Lake Ozette) during high flow events (May and Gresswell, 2003).

The guideline is further confounded by the fact that the "background" sediment loading during winter storm events is poorly documented for the Lake Ozette watershed, and therefore poorly understood, as significant upland disturbances occurred before any monitoring activities (such as the Makah Tribe's efforts on Coal Creek) were implemented. Finally, fine sediment loading is a well-understood factor limiting survival of salmonid eggs in river and lake habitat.

Comment: A paper written by Dr James Rochelle provides scientific arguments showing that virtually all of the ecological benefits that are expected from Olympic National Park expansion are already being addressed by the State of Washington Forest Practices Laws and the Programmatic *Habitat Conservation Plan* including the Monitoring and Adaptive Management elements.

Response: In general, these laws and plans are intended to provide for an economically viable timber industry in Washington State, while ensuring compliance with the Clean Water Act and the Endangered Species Act for riparian-dependent and aquatic species. Although the state's forest practice rules were found to meet the requirements of the Endangered Species Act, it does not necessarily follow that the same rules will meet the broader National Park Service mandate or afford the best protection to national park resources, because the objectives are distinctly different from the purpose of national parks, which is "... to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of

the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." (16 USC I). In order to meet the requirement to protect all national park resources and wilderness values, the objectives of the general management plan focus on protecting ecosystem function. In contrast, the forest practice rules focus on protecting one component of the ecosystem while providing for the economic viability of an industry.

Comment: On page 321, paragraph 5 under "Special Status Species" indicates that implementation of alternative D would result in long term moderate beneficial impacts on special status fish—there is nothing to back this claim.

Response: In general, the lower reaches of all rivers are found to be the most productive and diverse riverine habitats: as the gradient decreases, there tends to be a commensurate increase in channel complexity. Protection and restoration of these areas within the revised boundary will ensure that, over time, fish habitat in these areas recover to near historic conditions. Additionally, as the forest within the boundary area matures, ambient air temperature should decline, with the potential that the temperature of streams entering the lake will approximate natural levels. This will lead to beneficial effects to fish species.

Comment: Many area rivers have benefited from extensive habitat restoration projects and have salmon populations higher than any measured stream in Olympic National Park.

Response: Habitat restoration projects can certainly result in higher production of fish in areas impacted by human-caused disturbances, but only for the life expectancy of the project.

The purpose of these projects is to mimic natural conditions present before human disturbance. But without restoration of the natural processes that create the natural conditions, both the conditions and project benefits are temporary. Natural conditions and the natural processes that create them continue to exist within Olympic National Park.

Comment: The responses of Olympic National Park would likely be passive, and less timely than the active, directed efforts that could occur under current ownership. For these reasons, and because the amount of forest land that could potentially

influence the spawning areas is extremely limited, especially given the long period between management entries, park expansion to protect these fisheries from forestry-related habitat degradation is, in my opinion, unwarranted.

Response: It appears that the commenter's assumption is that the lands acquired will not be actively managed to achieve desired conditions. This is not the case. The National Park Service would indeed manage acquired lands to maintain or improve resource conditions.

Comments: The relatively good condition of the Lake Pleasant sockeye and Dickey River populations, in spite of similar logging practices to the Ozette watershed, supports the Ozette limiting factor analysis that multiple limiting factors are operating and further suggests that the relative importance of forest management as a limiting factor may be overstated.

The limiting factor analysis identified a number of additional factors limiting sockeye recovery in Ozette Lake. Among these are predation on adult and juvenile fish, both within the lake and in the Ozette River; lake level changes caused by early settlers clearing large woody debris for navigation on the Ozette River; poor spawning habitat conditions in the lake caused by the lake level changes; and low populations levels resulting from historic overfishing. The likelihood that these factors are of greater importance than forest management in limiting sockeye recovery is supported by observations of the status of fish populations in adjacent watersheds with similar physiographic conditions and logging and road construction histories. An example is the Lake Pleasant sockeye population, for which threatened species listing was not considered to be warranted at the time the Ozette sockeye was listed. This beach-spawning population is considered to be relatively healthy and stable, or possibly increasing (Personal communication; Chris Northcutt, Quileute Tribe, July 2006).

Although documentation is not in place to support the contention that forest management is a limiting factor for Lake Ozette sockeye, several factors are operating to ensure conditions are on an improving trend, making restriction of management activities as proposed by Olympic National Park, unnecessary. As a result of the logging history, most of the roads needed for future management are already in place, significantly reducing the level of

future road construction. Logging activity is at a moderate level and will continue to be into the future as a result of both stand age and harvest unit size regulations. Road maintenance planning and upgrading are taking place in the basin, with a focus on water quality and fish habitat improvements.

The regulations are supported by the State of Washington's *Habitat Conservation Plan* (NOAA Fisheries, U.S. Fish and Wildlife Service, 2006), which covers 70 species of native fish and amphibians, and applies to 9.3 million acres of state and private forestland and more than 60,000 miles of streams. The *Habitat Conservation Plan* states that Washington State Forest Practice Rules are strong enough to protect fish habitat and water quality in accordance with strict Endangered Species Act requirements.

In my view, park expansion for the protection of the threatened Lake Ozette sockeye salmon and its critical habitat, the watershed and water quality of the lake, and the view shed is not warranted, and in fact will be less effective in achieving these objectives than several programs currently in place. The expansion proposal fails to acknowledge the existence of these initiatives, which include the Washington Forest and Fish Regulations which are supported by a federally approved *Habitat Conservation Plan*, and the Lake Ozette Sockeye Salmon Recovery Planning process being administered by NOAA Fisheries. These initiatives, discussed further below, currently provide aquatic resource protection and will identify and implement restoration and enhancement activities targeted at the factors considered to be limiting sockeye salmon populations. Both of these initiatives include active processes, in comparison to Olympic National Park's proposals which are passive, and will lead to more rapid, focused improvements in habitat conditions for fish and wildlife.

This plan, originally scheduled for completion in December 2006 (and now expected sometime in 2007) is based on a limiting factor analysis that identifies and prioritizes factors limiting population recovery (Haggerty 2006). The limiting factor analysis has hypothesized, but not quantitatively demonstrated, cause and effect relationships between forest management activities and sockeye population declines. In fact, sockeye and other salmonid populations crashed before substantial timber harvest occurred in the Lake Ozette watershed (Dlugokenski et al. 1981; Jacobs et al. 1996). These hypothesized relationships of forest

management to sockeye declines, and lack of population recovery are largely based on past logging and road construction practices which preceded the adoption and continual strengthening of forest practice rules over the past several decades; the latest of these being the “Forest and Fish Regulations” and *Habitat Conservation Plan* discussed above. Nevertheless, the recovery plan currently under development will address those hypotheses by identifying actions to address concerns regarding detrimental effects of logging and road construction on sockeye habitat and implementing restoration or enhancement projects where a specific need is identified.

Since 2001 I have been an active member of what is now the Lake Ozette Sockeye Recovery Plan steering committee. Other committee representatives are from Olympic National Park, Indian Tribes, Clallam County, EPA, NOAA, private landowners, and several state agencies. Until 2006 our focus was on listing the factors limiting the recovery of sockeye and evaluating the supporting evidence that indicates that these factors have been or still are limiting that recovery. We are now developing the recovery plan. During this entire effort the Olympic National Park representatives have demonstrated an enormous disconnect with the existing ecological protection and management activities outside of the Olympic National Park boundaries. This disconnect is obvious throughout the *Draft General Management Plan* and is particularly demonstrated in the chapter entitled "Relationship of Other Planning Efforts to This General Management Plan." Neither the state *Habitat Conservation Plan*, the state forest practices laws, nor the state forest practices rules are referenced in this chapter. An honest presentation of the benefits of these existing policies shows that virtually all of the ecological reasons for park boundary expansion (listed on page 370 of the proposed plan) have already been fixed.

The recent upgrade of Washington Forest Practice rules as a result of “Forest and Fish Rules” established expanded riparian protection requirements as well as restrictions on all operations near water: requirements judged sufficient to meet Endangered Species Act requirements for protection of fish habitat and water quality. Implementation of the *Lake Ozette Sockeye Recovery Plan* is expected to eliminate or reduce the influence of other factors, such as predation and effects of coarse woody debris removal, that are judged to be limiting the sockeye

population. *Lake Ozette Sockeye Recovery Plan* implementation is also expected to result in substantial habitat enhancements necessary to quickly reach the goal of harvestable numbers of fish. Since both “Forest and Fish Rules” and the *Lake Ozette Sockeye Recovery Plan* involve directed, active efforts, they can be expected to support more rapid recovery of this depressed ESU than the passive approach that would occur under Olympic National Park jurisdiction.

Response: The *Final General Management Plan* has been updated and these references have been incorporated where appropriate.

The commenter is correct that under existing forest practice rules, the fisheries resources in the Ozette Watershed should receive greater protection over time than that provided by past rules, particularly as a result of improved road maintenance requirements and changes incorporated into the forest practice rules to encourage recruitment of large woody debris into larger stream channels. Additionally, forest and riparian lands will continue to be actively managed to achieve known desired future conditions that exceed standards of historic forest management practices. Nonetheless, cumulative effects of the protective measures provided by the forest practice rules are at best unknown and at worst insufficient to ensure the long-term protection of fisheries and aquatic resource to levels envisioned by the Park Service (in particular the listed Ozette sockeye and the endemic Olympic mudminnow) when overlaid on past practices.

According to the Department of Natural Resources stream database, there are approximately 350 lineal miles of rivers and streams in the Ozette Watershed. Of this, about 195 miles (more than 50%) are classified as type-N waters. Under the existing rules, approximately 110 miles of these streams (32% of the total known stream length in the watershed) could be left without any riparian timber buffer, and this would not include areas needed for road crossings or yarding corridors. As stated in previous responses, the type-N streams are usually quite small, and may be seasonal in nature, but they can collectively contribute a large amount of sediment to the larger streams (and ultimately, Lake Ozette) during high flow events (May and Gresswell 2003).

The Cooperative Monitoring, Evaluation, and Research Committee has recognized this uncertainty as well, and has identified the

evaluation of the ability of type-N buffer characteristics to provide desired riparian integrity and function as the number one priority for its effectiveness/validation program. They identified the need to evaluate the protective buffers for type-N streams as a high research priority, due to considerable uncertainty surrounding the current guidelines to adequately protect water quality and fish habitat. They felt that there was a high risk to the resource with a high level of uncertainty regarding the science and/or assumptions underlying the rule (Cooperative Monitoring, Evaluation, and Research Committee 2006). This fact, coupled with the fact that sediment loading in sockeye spawning habitat of Lake Ozette has been identified as a critical factor limiting sockeye production and the fact that lake-spawning sockeye are limited to a few hundred meters of habitat on the Lake Ozette shoreline, suggest that a conservative approach is warranted.

The 1999 *Forest and Fish Report* recognizes that forest practices—and roads in particular—affect delivery of sediment to fish-bearing waters. The rules adopted subsequent to the report allow for an increase in sediment loading from old roads up to 50% above natural background levels (Schedule L-1). During summer low flows, this may be an insignificant increase. During winter storm conditions, a 50% increase in sediment loading could represent the delivery of a large quantity of material to spawning areas (Herrera, 2006). Additionally, the standard assumes that the underlying natural background level is known; it is not known for Lake Ozette.

The new road standards for forest practices direct that there be a decrease in the amount of road runoff entering streams. However, this is accomplished by diverting road surface runoff onto hill slopes rather than directly into stream channels. This re-direction is often inadequate to prevent surface flow from entering streams during storms, especially when the roads are in close proximity to streams. Further, the re-direction can cause other problems, such as hill slope gullying, which significantly increases sedimentation. Diversion of surface runoff can also increase the mass failure rate, potentially increasing sediment delivery to Lake Ozette.

In addition to the potential for forest roads to continue to deliver sediment to the local streams, they will continue to alter basin hydrology through the interception of surface and groundwater (Herrera 2006). While some road management practices can provide reductions in the amount of road runoff directly entering streams, these practices cannot eliminate road runoff into streams. This road runoff, independently or in combination with overland flow from recently harvested areas, has been shown to affect peak stream flow (Bowling and Lettenmaier 1997; Heeswijk et al. 1996; Storck et al. 1995; Coffin and Harr 1992). The *Forest and Fish Report* addresses this by establishing a resource objective that 2-year peak flow events not be increased more than 20% as a result of forest practice actions (Schedule L). However, it is not clear that the new rules contain adequate assurances that the reductions in runoff will be either significant or adequate in watersheds such as Lake Ozette (with high levels of road density and recent logging) to meet the objective.

Further, there is some question as to whether or not the standard of a 20% increase is adequate to protect fish and other aquatic resources. A 2-year peak flow is capable of mobilizing the stream bed, with resulting mortality of in-gravel eggs and alevin. Thorne and Ames (1987) found that sockeye egg survival decreased dramatically with increased maximum peak flow during the incubation period. In that case, a 20% increase in peak flow is calculated to result in an 11% reduction in fry production. A similar reduction in fry production was found by Holtby and Healey (1996) for Carnation Creek. For tributary-spawning sockeye in the Lake Ozette watershed, increased peak flows could represent a significant decrease in fry production, thus increasing recovery time and/or reducing carrying capacity below historic levels.

Cumulative effects of roads cannot be ignored either, including the potential for pesticide contamination of Lake Ozette through routine use of herbicides to control vegetation. There are about 420 miles of road in the Ozette watershed, or about 5.5 miles of road per square mile (mi/mi²) (Haggerty et al. 2007). On non-federal lands only, the road

density exceeds 6 mi/mi². Evidence suggests a strongly negative correlation between road densities and fish production (Sharma and Hilborne 2001; Thompson and Lee 2000; Pess et al. 2002), with densities as low as 1.6 mi/mi² having an identifiable effect on the fisheries resource (Thompson and Lee 2000). NOAA Fisheries' 1996 guidance document for salmon restoration initiatives (NOAA 1996), describes basins with road densities of 2-3 mi/mi² as being "at risk," while basins with road densities of >3 mi/mi² as "not properly functioning."

In streams that will be moderately protected by riparian buffers, there remains some question as to whether these buffers will provide the stated desired future conditions (Shuett-Hames et al. 2005) or whether the buffers are adequate to meet requirements for restoring large woody debris to the channel or reduce stream temperatures. Evidence suggests that stream temperature is more closely related to the ambient air temperature than to solar radiation (Sullivan et al 1990; Theurer et al. 1984). Ambient temperature at the margin of a clearing may be substantially higher than temperatures in the interior, with the temperature remaining elevated for up to several hundred feet (Chen et al 1995). Therefore, though riparian buffers may be adequate to provide shade and cover, they may not be adequate to provide the cooling affect of a mature forest stand, leading to increased stream temperatures.

In addition, the "Lake Ozette Sockeye Recovery Plan" being drafted by NOAA Fisheries in cooperation with the Lake Ozette steering committee is still a draft document. The draft document was scheduled for completion and public comment by December 2006. However it now appears that it may not be ready for public review until sometime in 2007, with the final recovery plan to be adopted following the public review period. The "Lake Ozette Sockeye Recovery Plan," though complementary to this general management plan in its basic objectives, should not necessarily direct actions put forth by the National Park Service that are considered necessary to meet National Park Service goals beyond recovery of the listed sockeye species. Conversely, the general management plan is flexible enough to include recovery actions that may be specified in the "Lake Ozette Sockeye Recovery Plan," acknowledging that the "Lake Ozette Sockeye Recovery Plan" will recommend only voluntary guidelines, not mandatory actions, for achieving recovery.

Additionally, although predation has been identified as a limiting factor for Lake Ozette sockeye, the methods identified to alleviate this factor include either creating conditions in the Ozette River to increase sockeye predator avoidance or increasing sockeye abundance in order to restore the natural predator-prey balance. Increasing sockeye abundance will require increasing the productive capacity of the ecosystem. Finally, habitat improvement projects will help increase productive capacity in the short term, but restoration of the biological and ecosystem processes will be required to maintain habitat function over the long term.

Comment: NOAA and the Lake Ozette Recovery Plan steering committee are now developing the recovery plan for sockeye, which will include recognition of the *State Habitat Conservation Plan*. For successful recovery of sockeye, three additional things appear to be necessary within the current park boundaries, none of which are likely under the parks "wilderness" mandate: 1) eliminate or significantly reduce predation by seals, river otters, cutthroat trout, and pike minnows in the lake and the Ozette River; 2) relocate enough large woody debris in the Ozette River to re-elevate the lake to its natural level; and 3) clean the lake gravels that have been silted in from tributary incising caused by the lower lake levels caused by removal of woody debris from the Ozette River. The Olympic National Park plan should allow these restoration projects to happen so that lake spawning sockeye populations can recover. Expanding the park boundaries will do nothing to fix these problems.

Response: Wilderness designation in itself does not preclude restoration activities. In fact, the stated desired natural resource conditions in the *Draft General Management Plan* specifically allow for restorative actions within wilderness zones (page 58). However the designation may shape the manner in which those activities occur. Any actions proposed in wilderness are evaluated through a minimum requirement process: first to ensure that the action is necessary and appropriate in wilderness and second to determine the tools and methods that would be used to successfully accomplish the project while having the least impact on wilderness resources (*Draft General Management Plan*, pages 77-78).

It is unlikely that any existing or new wilderness designation will greatly affect recovery actions specified in the *Draft Lake Ozette Sockeye Recovery*

Plan, since 1) primary locations for placement of large woody debris in the Ozette River are located in the upper 1500 meters of the river outside of the wilderness designation; 2) the *Draft Lake Ozette Sockeye Recovery Plan* does not specifically call for predator control (killing or relocating natural predator populations), but instead refers to actions to limit predator efficiency (such as adding wood to the Ozette River and modifying the weir at the outlet of the lake), actions to restore natural biological processes (such as increasing sockeye productivity to restore natural predator prey abundances), or modification of fishing regulations for selected predator fish populations, if such regulations were consistent with the status of those predator species; and 3) as a restorative action, gravel cleaning could be considered under both existing designation or wilderness designation.

Additionally, it is recognized that a number of factors are believed to have contributed to the decline of sockeye in Lake Ozette and that the initial decline of the population predates the years of most rapid timber harvest in the watershed.

Comment: Coho salmon production in streams in the watershed of Lake Pleasant is high and increasing. Over 85% of the watershed is in state and private ownership and has many similarities to Ozette with regard to geology and logging history. (WA Department of Natural Resources, Sol Duc Watershed Assessment 1994)

Response: Although it is true that the Lake Pleasant watershed is in relatively good condition, it is important to note that the North Olympic Peninsula Lead Entity Salmon Habitat Recovery Project Strategy (2004) identified land acquisition as an important tool to protect functioning habitat in the system. Ultimately, the Salmon Recovery Funding Board awarded a project to acquire lands on Lake Pleasant and along Lake Creek to ensure their continued protection. Additionally, the Sol Duc watershed analysis highlights the need to preserve riparian function in Upper Lake Creek above Lake Pleasant. (Sol Duc Pilot Watershed Analysis, Section 2.6, USFS, 1995)

Comment: The Dickey watershed, a Quillayute River tributary largely in private ownership and managed for forest products, has supported healthy Coho salmon populations on a continuing basis (Washington Department of Natural Resources Watershed Assessment 1998). Significant spawning densities of Coho salmon occur in almost all

tributaries of the Dickey, which has similar soils and geology and a logging history comparable to that of the Ozette Basin. This river system was rated healthy by the Washington Department of Fish and Wildlife and considered one of the most productive for Coho salmon in the state (WDFW 1992).

Response: The commenter is correct in noting that the Dickey watershed and Ozette watershed are similar in ownership and land use. However, caution should be used when comparing fish production between the two systems. The Dickey watershed contains habitat characteristics that are strongly conducive to Coho production. The basin is dominated by low gradient habitat (<0.5%) (Hook 2004), with a number of backwater sloughs, small streams, and wetland areas. Although the Ozette watershed cannot be characterized as mountainous, the relief is more pronounced with a maximum elevation 25% higher than the Dickey (1,900 ft vs. 1,400 ft) while the watershed area is 25% smaller (77 sq mi vs. 108 sq mi). Consequently, the Ozette tributaries tend to be steeper and more prone to faster flows than those in the Dickey. Due to the low gradient nature of the Dickey system, mass wasting events are rare (WRIA 20 limiting factor analysis). Conversely, landslides in the Ozette watershed are a relatively common occurrence; 12 slides were documented during the six years from 1994 to 2000 (Herrera 2006).

Caution should also be used in equating Coho production in the Dickey watershed to relative watershed health. A number of limiting factors are identified for the Dickey (WRIA 20 limiting factor analysis), including excessive sediment, riparian impacts, water temperatures, etc. Although the Dickey is a strong Coho producer, alleviating these limiting factors will likely result in improved Coho production.

Fisheries, Lake Crescent Boundary Adjustment

Comment: Available information suggests there is little justification for park expansion in the area of the Lyre River outlet of Lake Crescent. The *General Management Plan* indicates the purpose of this expansion is for the protection of the spawning areas of the Beardslee rainbow and the Crescenti cutthroat trout, both of which are resident in Lake Crescent except during the spawning period when they enter the Lyre River. The spawning area for Beardslee trout is limited to a 400-foot stretch of the

Lyre River above the Lyre Bridge, just downstream of the lake outlet. The cutthroat spawning area extends approximately 1 mile downstream of the outlet to the mouth of Boundary Creek (Goin 2002).

As they have received little study, life history information for both of these fish stocks, which are endemic to Lake Crescent, is limited. Observations that do exist indicate that spawning counts of both Beardslee and Crescenti trout have declined in recent years. Goin (2002) lists several factors considered to be negatively affecting these fish stocks. These include a loss of spawning area, due to logging on Piedmont Creek and to boating and human activity on the long channel in Lake Crescent above the outlet to the Lyre River. These activities apparently result in siltation of spawning gravels downstream of the lake outlet to the river. Goin (2002) also points out that several of the major spawning sites in the Lyre River are associated with logjams that accumulate gravel, forming spawning areas. These logjams, which are deteriorating and becoming smaller with time, are considered vital for gravel retention and when they are lost, the result will be the loss of most Lyre River trout according to Goin (2002).

In addition, the presumption that harvesting of timber on state and private lands pursuant to the existing regulatory standards would result in adverse impacts to Cutthroat and Beardslee trout spawning habitat lacks any scientific reference or data.

Response: Generally, there is a concern that forest practice rules were evaluated at a state-wide level, with little consideration for discrete, unique fish populations. In fact, the new forest practice rules effectively eliminate use of the one tool (watershed analysis) which could be used to analyze cumulative effects on a finer scale.

The commenter has correctly stated that Beardslee trout and Crescenti (cutthroat) trout are endemic to the Lake Crescent system and spawn in discrete, limited locations within the watershed. These populations are keystone species of the Lake Crescent ecosystem and must be protected to a level that not only ensures their existence in perpetuity, but also ensures that they thrive at levels required by the National Park Service's primary mandate to preserve "unimpaired for the enjoyment of future generations."

Without forest practice rules that allow for analysis of forestry impacts on unique populations within an individual watershed, there remains considerable uncertainty that these rules will adequately ensure the protection of Beardslee and Crescenti trout spawning habitat. Acquisition of uplands adjacent to the spawning habitat for these species with active management of these lands to achieve conditions appropriate for their protection at levels required by the National Park Service mandate, is one reasonable approach to assure the long-term protection of these fish populations.

The adequacy of the Forest Practice Rules to protect fish within Olympic National Park is discussed in detail within other responses.

Comment: Washington Trout, a citizen's group, considered harvesting of Beardslee trout by sport fishermen to be the major cause of their decline (WA Trout n.d.). Habitat quality was not considered a problem since the Lake Crescent watershed lies almost entirely within the park, which provides protection from habitat degradation potentially associated with land use activities. In response to the urgings of Washington Trout, Olympic National Park has modified fishing regulations in Lake Crescent to protect Beardslee trout.

Response: The commenter has correctly noted that Washington Trout (now Wild Fish Conservancy) and Olympic National Park identified overfishing as one of the factors affecting the abundance of Beardslee Trout and Crescenti Trout.

In 2000, Olympic National Park changed fishing regulations on Lake Crescent to catch-and-release, based on the limited number of spawners and recommendations from a scientific panel that was assembled to discuss fisheries management issues in the lake (Larson, 2003). Annual monitoring of escapement at the lake outlet and in Barnes Creek revealed a steady increase in number of spawners over a four-year period immediately following implementation of catch-and-release fishing.

However, annual escapements have subsequently leveled off in recent years, despite restrictive fishing regulations and Olympic National Park biologists are concerned about changing habitat conditions (e.g. sediment levels, loss of gravel, and presence of thick algal mats) at the lake outlet and the upper Lyre River.

The spawning areas for these genetically unique trout populations are highly localized and any deleterious changes in habitat conditions may have significant effects at the population level.

Tribal Consultation — Boundary Adjustments

Comment: Before engaging in boundary expansion, the Park Service should engage in consultation about the feasibility and impact of such expansion. The Park Service should have a compelling reason for its expansion and not take it as a matter of right.

The tribes would want to be consulted on a case-by-case basis for any changes in park boundaries. There are a number of effects that boundary changes would have on tribal members and the environment that were not mentioned in the potential negative effects portion of the analysis. A change in status of land to the park from another entity such as state land may effectively change the status of the land from an area that is hunted by tribal members to one that is not. This would effectively be considered a taking from the tribe's treaty rights.

The proposed boundary adjustment near the South Fork of the Hoh River in alternative B is in this category and is opposed by the Hoh Tribe. The Park Service would have to detail the impacts of any such activity on the tribe's present transportation system.

The tribe has serious concerns about the effect of proposed boundary expansions on the tribe's ability to exercise its treaty hunting and gathering rights. The effects of the park boundary expansion on road access to and from the southern portion of the Makah Reservation should also be analyzed. How will the boundary expansion affect road access to and from the Reservation?

Response: Olympic National Park is committed to continuing and improving its government-to-government relationship with federally recognized tribal governments (see page 12 of *Draft General Management Plan*). In accordance with the Presidential Memorandum of April 29, 1994 and Executive Order 13175, "Consultation and Coordination with Indian Tribal Governments," Olympic National Park will continue to work with Indian tribes on a government-to-government basis to address issues concerning Indian tribal self-governance, trust resources, and Indian tribal treaty and other rights and concerns. Olympic National

Park will work closely with the tribes in implementing the general management plan to ensure that existing treaty rights are not affected by actions within the plan.

In addition, as an updated land protection plan is developed (page 151 of the final plan), the Park Service will work with the tribes on a government-to-government basis to address their issues and concerns. This has been clarified in the final plan.

The preferred alternative (page 115 of the final plan) does not include a proposed boundary adjustment near the South Fork of the Hoh River or along the southern boundary of the Makah reservation.

Socioeconomic Environment, Economic Analysis for Boundary Adjustments

Comment: Aside from the likelihood of another trust beneficiary lawsuit, a much bigger economic impact is likely if the proposed 44,000 acres of private land becomes state managed "Legacy Forests," especially if these lands are constrained by Forest Stewardship Council certification. Jobs will be lost. Schools and junior taxing districts will suffer.

Response: The preferred alternative has been modified in the final plan and calls for the National Park Service to work with the state to identify lands within Washington (not just in the Ozette watershed) that would be suitable for the exchange for mineral rights currently held by the state within Olympic National Park. State lands under a forest stewardship certification program have not been shown to cause job loss and there would still be economic benefits provided by sound applications of sustainable forest management practices.

If appropriate exchange lands are identified, these areas proposed to be transferred to the state would likely continue to be managed as working forests that provide revenue to local schools or local taxing districts. It is expected that through the exchange—in which the state acquires forest lands in exchange for their mineral rights—schools and tax districts would continue to be beneficiaries of state revenues.

No proposals in this general management plan would alter the revenue capabilities of the Washington Department of Natural Resources on the lands acquired from the National Park Service by the land exchange.

Comment: The National Park Service data, and analysis of the same, associated with the economic benefit of boundary expansions does not appear to comport with the Information Quality Act (44 U.S.C. Sec. 3516) and the guidance associated with said Act as provided by the Office of Management and Budget. The economic analysis appears to lack significant quality in the information provided and relied upon. Also, the analysis appears to lack objectivity with regard to the total economic impact of specific proposed boundary expansions at Lake Ozette. The city would specifically request correction of the presentation and substance of the economic analysis of the Ozette area boundary expansion.

The *Draft General Management Plan / Environmental Impact Statement* appears to emphasize possible improvements in the economic situation of the local communities by pointing to the various projects associated with implementing the general management plan. However, in discussing those socio-economic impacts, there is no offset shown for the loss of jobs, direct or indirect, from timber management and harvest of those lands.

In a 1992 study of the impact of timber harvests to jobs, undertaken by Richard Conway for the Washington Forest Protection Association and the WA Department of Natural Resources, it was demonstrated that approximately 8 direct jobs were created for every million board feet of timber harvested. If that harvest was sustainable, those said jobs would be sustained as well. If the 60,000 acres would produce a sustainable harvest level of 30mmbf, then there are arguably 240 direct jobs associated with that acreage in Clallam and Jefferson Counties.

The city of Forks renews its request that the Lake Ozette boundary discussion be corrected to accurately, and without bias, present the total economic impact associated with the preferred alternative. The boundary expansion proposal includes the transfer of 60,000 acres of private, actively managed forest land that supplies timber to area mills. As explained later in the Draft General Management Plan, approximately 12,000 acres is associated with the park boundary expansion, as well as 44,000 acres to be acquired and transferred to the state in exchange for the state deeding mineral rights to the National Park Service. The impact of this loss of timber supply source is not even remotely discussed in the *Draft General Management Plan*.

A local regional economic development project involves placing energy-generating facilities in this region which would use mill waste and forest residuals as a fuel source. The withdrawal of commercial forest land base will impact this economic development project; the lack of analysis of the impacts of such withdrawals would appear to conflict with both state and national public policy which encourage development of alternate energy sources.

In the *General Management Plan* socio-economic impact analysis, more work is needed to clarify and predict impacts to the local economy. The loss of commercial forest lands, through proposed boundary adjustments, will have a significantly greater impact on our local economy than the *Draft General Management Plan* states.

The *General Management Plan / Environmental Impact Statement* should analyze the social and economic effects of the proposed park boundary expansion, particularly how it would affect the Makah Tribe's ability to acquire lands for economic development.

Response: The National Park Service relies on economic and demographic information available at the time the analysis is undertaken and the draft document is prepared. These data are continually revised as new data becomes available. The impacts to the socioeconomic environment have been re-evaluated and updated within the *General Management Plan*. The information necessary and sufficient for decision-making purposes is provided.

It is recognized that some members of the local communities view that because forests within the Olympic National Park are protected from harvest, any potential expansion of the park is viewed as potentially adverse to the long-term economic viability of the regional timber-related economy and associated employment.

However, the proposed boundary expansion and land acquisition (about 16,000 acres rather than 60,000 acres indicated in the comment) in the preferred alternative is a relatively small part (< 1%) of the private- and state-managed forest land potentially available to the forestry industry within the four-county region. Also included within the 16,000 acres is approximately 2,500 acres of land that have been designated by the Washington Department of Natural Resources for old growth management, further minimizing the amount of

harvestable acreage. Any acquisition would be through donation or purchase from willing sellers choosing to exercise their rights as property owners.

The commenter is correct that lands within the 16,000 acres of land sold or donated to the National Park Service would no longer be harvestable once it enters into the federal domain. However, much of that land was recently harvested and replanted and hence would not yield economically recoverable quantities of commercial timber for 30 to 50 years, or even further, into the future.

Furthermore, it is likely that private landowners (individuals, families, corporations, etc.) would sell/harvest any commercial grade timber on the remaining lands prior to a sale or donation, with the subsequent sales or donations occurring over a period of time. Under such a scenario, these harvests would support local logging and wood processing industries for the foreseeable future unaffected by the proposed boundary changes and changes in ownership. Thus, the potential impacts to local jobs, mill operations, and local communities would only materialize over the very long term. In that future time period, some logging and wood processing jobs would be effectively foregone, although the number of jobs affected would be substantially lower than suggested by the commenter if for no other reason than the smaller area involved. In addition, to achieve park restoration goals, it will be likely that the Park Service would have to seek contractors or employees from the local area for silvicultural management of the acquired lands.

The state of Washington would receive replacement resource lands outside the park, estimated to total about 44,000 acres, which would then be used to provide income for the state through sustainable commercial forest practices. There could still be timber jobs related to the ongoing timber harvest on those 44,000 acres of land exchanged to the state. These lands may or may not be located in Clallam County. The effect of the proposed land exchange would not result in any net reduction in harvestable timber. Since the proposed land exchange involves mineral rights located within the park, the local economy and the Department of Natural Resources would not realize any net reduction of harvestable timber.

Any adverse impacts on the local/regional economy or the tax base would be largely mitigated by these factors.

Government-to-government consultation would occur through the boundary adjustment and land exchange process to assure that the lands to be acquired would not affect the Makah's ability to acquire land for economic development.

Comment: Lake Ozette Boundary Expansion 1. The *General Management Plan* does not appear to clearly indicate the total amount of acreage by owner categories (e.g., state land, large private land owners, small private land owners) associated with each proposed boundary adjustment for each of the Olympic National Park regions. Why is a summary of the acreage per area only found on pg. 372 of the *Draft General Management Plan*? It is odd that this information is not more clearly articulated earlier in the document. Nor, does it appear to indicate the extent in "acres by owner" categories for the proposed "cooperative private/public land conservancy strategies." This information, provided by park area and by each alternative, would have been very helpful in undertaking further analysis of the proposals. The numbers provided only address property acquisition, and not the acreage envisioned by the National Park Service for "cooperative private/public land conservancy strategies."

Response: The summary of acreages included in the proposed boundary adjustment has been updated in the *Final General Management Plan* in Chapter 1 to include a breakdown of private, state, and federal ownership.

Given that general management plans are general in nature, and out of respect for land owner privacy, specific owner identification is not included. This level of research is normally completed as part of a land protection plan, which would be developed after the *Final General Management Plan* is approved.

Socioeconomic Environment, Jobs, Boundary Adjustment

Comment: Economy of the area would be adversely impacted. The proposed expansion would include private, federal, and state land which now provides family wage jobs in logging, sawmills, trucking, paper, and related industries. These industries and private land also provide a tax base to support our area schools, hospitals, and other services.

We believe that primary and secondary employment loss with the timber industry will be far greater than *General Management Plan* states.

It does not appear that any of the proposals, including the preferred, for the Olympic National Park's holdings in western Clallam and Jefferson counties would generate as many jobs as a result of implementing such proposals. Neither the *General Management Plan's* selected references nor preparers or consultants appears to include (1) third-party real estate appraisers, (2) economists versed in issues associated with the transference of land from managed timber to federal park designations; or, (3) economists versed in the differences in direct and indirect job creation associated with specific land uses.

The loss of existing and potential jobs is another significant impact to us. Some of the timber companies have estimated the 60,000 proposed acres could provide a sustainable yield of 50-60 million board feet of lumber per year forever. This is enough lumber to supply a local mill for at least a year. The average mill typically would have at least 140 employees, which in turn would probably generate another 80 related service jobs. These jobs are all considered family wage earning positions. Every family wage earning job is important in our county, as we have lost so many in recent years. These jobs would never be regained if these 60,000 acres were added to the Olympic National Park.

The proposed additional acreage would, according to some within the timber industry, be adequate to supply one lumber mill with enough product to maintain 100 employees. The removal of such a large volume of harvestable land would appear to have an economic impact that should be discussed as part of any alternative other than the "Alternative A: Current Management" proposal. Pages 35-36, M21-24, 91, 230-232, 268-271, 306-308, and 346-348 have no references to any possible impacts associated with the conversion of the existing timber lands into parklands.

The maximum possible withdrawal from the commercial forest land base appears to be 60,000 acres. It has been estimated that this would equate to approximately the annual supply of one modern mill on the Peninsula. Private businesses, local governments, and other area economic development groups have been looking for ways to attract another mill to the Peninsula which could

find a niche in the diversification and value-added evolution of the forest products industry.

Response: The preferred alternative calls for the addition of 16,000 acres, not the 60,000 acres the commenter cites, to the boundaries of Olympic National Park; these acres would be precluded from future commercial harvesting once the acres were acquired. As indicated above, these lands could be harvested prior to their acquisition, thereby contributing support to local industry in the short term, but resulting in the net reduction in long-term sustainable yields, materializing over the next 30 to 40 years. Moreover, available data suggest that sustainable yield from these lands would be much lower than indicated by the commenter; these lands alone could not supply the needs of most existing or prospective mills. As elsewhere, the local industry has been consolidating and investing in fewer, but more highly automated and higher capacity mills. In 2004, six of the ten sawmills in the region had annual capacities in excess of 50 mmbf/year (based on 260 days of single-shift operations), with two of those having annual production capacities in excess of 140 mmbf/year. As a result, the likely effects of the reductions in sustainable yields would include fewer direct local jobs, as well as fewer indirect and induced jobs in the local, regional, and statewide economies, but not of the magnitudes suggested by the commenter. The timber on the identified lands is not uniquely suited to the particular forest products currently being manufactured in the local area.

The state of Washington would receive replacement resource lands outside the park, estimated to total about 44,000 acres, which would then be used to provide income for the state through sustainable commercial forest practices. There could still be timber jobs related to the ongoing timber harvest on the 44,000 acres of lands exchanged to the state. These lands may or may not be located in Clallam County. The effect of the proposed land exchange would not result in any net reduction in harvestable timber. Since the proposed land exchange involves mineral rights located within the park, the local economy and the Department of Natural Resources would not realize any net reduction of harvestable timber.

The 44,000 acres of land that could be exchanged with the Department of Natural Resources under the preferred alternative would not be included within the park boundaries, and would therefore likely continue to be managed by the Department of Natural Resources as a harvestable forest, though

these lands would not necessarily all be local. The areas proposed to be transferred to the state would likely continue to manage as working forests that provide revenue; schools and tax districts would continue to be beneficiaries of state revenues.

Any adverse impacts on the local/regional economy or the tax base would be largely mitigated by these factors.

Socioeconomic Impact, Taxes, Boundary Adjustment

Comments: Any discussions of boundary modifications and restrictions on the use of federal lands should include consideration of federal impact funds provided to area local governments to affect the loss of property taxes, timber excise taxes, etc. Existing federal programs, including the Payments-in-Lieu-of-Taxes (PILT) program and the Secure Schools and Communities Act are inadequate at this time. Although the PILT program is regularly reauthorized, it has never been fully appropriated. And the Secure Schools and Communities program expires this year. While we continue to request an extension of the existing program and a solution to permanent funding, factually this program is not a reliable source of financial impact mitigation.

We are a property tax poor district [Quillayute Valley Schools]. Any additional cuts in private property would severely hamper the school district's ability to pass levies and bonds. Removing land that generates timber excise taxes and taking those lands off the tax rolls would cut like a double-edged sword.

An additional topic that is not fully discussed in the *General Management Plan* is the impact the expansion and the Department of Natural Resources-National Park Service exchange would have on the tax base relied upon by local governments.

How will traded trust lands result in revenues on the “out of park” holding? The concern is that potential for revenue to support the school trust will actually decrease because of harvest restrictions placed on the traded lands. Will this be factored into the equation on how much land is required to meet the true value of the traded land?

The proposed alternative and the analysis of the conversion of state—as well as private—lands lacks any economic impact analysis to (1) local economies; (2) tax base; (3) state trust lands and the beneficiaries of such lands; etc.

The potential loss of state revenue covered by withdrawing additional lands from the commercial forest base could be very significant to Clallam County and other local government entities. This impact should be further analyzed and mitigation proposals presented for review and comment.

The plan does not take into consideration the affect of reducing the total amount of lands capable of producing harvestable timber by trading for adjacent private timber lands.

Response: The National Park Service appreciates the fiscal links between land ownership, local government, and local funding support for public education in the state of Washington. The *Final General Management Plan* contains narrative acknowledging the long-term increases in PILT revenues associated with the proposed boundary adjustments. Revenues associated with the Secure Schools and Communities Act would be unaffected by future boundary adjustments.

With respect to long-term impacts on local governments and school districts, larger tracts devoted to growing and harvesting timber are typically “designated forest lands.” The value of timber resources on designated lands is exempt from current property taxes; only the value of underlying lands is taxable. However, the value of timber is subject to an excise tax at the time of harvest or, alternatively, to a compensating tax, should the current or future landowner choose to withdraw the land from commercial harvest.

There are nearly 298,000 acres of privately owned “designated forest lands” in Clallam County, with an average taxable value of about \$108 per acre, and nearly 172,000 acres of such land in Jefferson County (Washington Department of Revenue 2006). Information regarding the distribution of those lands among the various school districts and the composition of the valuation of school districts was incomplete. Applying that value to the potential 13,640 acres of lands located within Clallam County associated with the proposed boundary adjustments yields a total taxable value of about \$1.47 million; or about 0.5 percent of the Quillayute Valley school district’s current \$287 million valuation.

Furthermore, some or all of the reductions could be offset as a result of higher valuations on other properties due to amenity values associated with proximity to the park or the protected “open space” status afforded by the park.

Under the proposed boundary adjustment and land exchange, there would be continued timber severance revenue to local taxing districts from the harvest of timber prior to any transfer of private lands to the National Park Service. Additionally, there would be no change in the state-provided revenue to the county and other local taxing districts because the exchanged lands would continue to be managed by the state as sustainable working forests. It is anticipated that through the exchange, schools and tax districts would continue to be beneficiaries of state forest revenues.

The proposed boundary expansion in the preferred alternative of about 16,000 acres is a relatively small part (< 1%) of the forested land potentially available to the forestry industry on the Olympic Peninsula. As discussed above, if the timber is harvested before the land is sold or donated to the NPS, then there would be negligible impact upon the forestry industry. If the land was sold or donated with the timber intact, then there would be some additional harvestable timber resources unavailable to the local forestry industry. The impact from this action would depend upon the age, condition, quantity, and quality of the timber stand at the time of acquisition. In addition it is not likely that the entire 16,000 acres would be acquired at one time; it would likely occur over many years. Thus, any impacts resulting from acquisition of these small areas would be negligible to minor in effect regarding (1) local economies; (2) tax base; (3) state trust lands and the beneficiaries of revenues from such lands. This information has been included in the *Final General Management Plan*.

Any impacts association with the implementation of the preferred alternative would be negligible to minor in the short-term and minor to moderate in the long-term on the regional timber and woods processing industries, depending on the timing and the lands involved in the boundary adjustments. The boundary adjustments could have minor long-term fiscal effects for local governments, but the timing and beneficial or adverse nature of these effects cannot be determined given current information.

To the extent that harvesting occurs prior to donation or sale to the government, timber excise taxes would be generated as harvests occur, benefiting local and state governments, as well as local school districts and other districts whose boundaries encompass the harvested tracts.

This updated analysis has been incorporated into the final EIS.

Comment: What compensation will there be for any restrictions to harvest, for the Forks Community Hospital, other than increased tax levies?

Response: The proposed boundary adjustments may or may not affect timber harvests on the affected lands in the short-term. Some of the lands were recently harvested and much of the other lands would likely be harvested prior to entering the federal domain. Thus, the effects on harvest and the underlying ad valorem tax base of the Forks Community hospital and other local taxing jurisdictions would be minor, with little or no discernible effects on tax levies. Furthermore, some or all of the reductions could be offset due to higher valuations on other properties due to amenity values associated with proximity to the park or the protected “open space” status afforded by the park.

Comment: There is no recognition or discussion of the State of Washington's fiduciary responsibility related to trust land management.

Response: The National Park Service would expect that fiduciary responsibilities would not only be unimpeded but would be facilitated by the cooperative actions outlined in the preferred alternative which would add some 44,000 acres of sustainable commercial working forest land to the state land base and associated trust revenues.

Tribal Concerns, Boundary Adjustment

Comment: The boundary adjustment analysis does not mention any of the negative effects on tribal members' access to the area, or effects on hunting, gathering, and fishing. Would the Olympic National Park be willing to dedicate the necessary funding to properly address the environmental issues associated with newly acquired land within the Hoh Tribes “Usual and Accustomed Area?”

The plan must address potential impacts to tribal hunting.

Response: The preferred alternative (page M32) does not include a proposed boundary adjustment within the Hoh “Usual and Accustomed Area.”

Olympic National Park is committed to continuing and improving its government-to-government relationship with federally recognized tribal governments (see page 12 of *Draft General Management Plan*). In accordance with the Presidential Memorandum of April 29, 1994 and Executive Order 13175, “Consultation and Coordination with Indian Tribal Governments,” Olympic National Park will continue to work with Indian tribes on a government-to-government basis to address issues concerning Indian tribal self-government, trust resources, and Indian tribal treaty and other rights and concerns. Olympic National Park will work closely with the tribes in implementing the general management plan to ensure that existing treaty rights are not affected by actions within the plan. This has been clarified in the final plan.

U.S. Forest Service Lands, Boundary Adjustment

Comment: We do not see any analysis of the impacts associated with the loss of the existing lands in the Olympic adaptive management area of approximately 700 acres owned by the USFS (*General Management Plan*, page 35). These lands are subject to limited silvicultural treatments pursuant to the Northwest Forest Plan (NWFP) and “will be used to develop and test management approaches which meet ecological, economic, and social objectives.” We believe the *General Management Plan* has not thoroughly analyzed the impact of the NWFP and its associated protections already in place in relationship to the lake habitat. Regarding the 80 acres of Department of Natural Resources owned trust lands, more information would be required to determine what deferrals are currently in place on those lands.

Response: These numbers were incorrectly stated in the plan and have been revised in the final plan. There are 700 acres of land currently within the boundary of Olympic National Forest at Lake Crescent. Of that, 80 acres are managed by the Olympic National Forest, and the remaining acres are in either private or state ownership. Additional coordination would occur between the National Park Service and the U.S. Forest Service to determine the best protective strategy for U.S.

Forest Service administered lands in these areas. In addition, a subsequent land protection plan would be developed to address the specific deferrals that are currently in place on Department of Natural Resources owned trust lands.

Vegetation, Boundary Adjustment

Comment: On pages 207, 243, 282, 319, the plan states: “Logging activities, especially after the wide use of mechanical cutting methods, have had a major adverse effect on mature (old-growth) forests... These actions have had moderate to major adverse impacts on native vegetation communities in the region.” There is no science in your *Draft General Management Plan* supporting this claim.

Response: According to National Park Service methodology and intensity descriptions on page 188 of the *Draft General Management Plan*, removing vegetation from a small area that causes a change in abundance or distribution, and changing the ecological processes to a limited extent, is considered a “moderate” adverse effect. If the action results in a change in the overall biological productivity in a relatively large area, that effect is “major” and adverse.

Since mechanical cutting has removed old growth forests in the past in a relatively large portion of the Olympic Peninsula, resulting in a change in the ecological processes in those areas, this has resulted in moderate to major adverse effects to vegetation. The analysis is correct as written.

Viewsheds, Boundary Adjustment

Comment: “Forest and Fish Rules” addresses viewshed concerns through its limitations on harvest unit size and requirements for green-up prior to harvest of adjacent units. “Forest and Fish Rules” also contains provisions for voluntary modification of management practices in areas of high public exposure and aesthetic sensitivity.

Response: As stated in the *Draft General Management Plan*, appendix B, protection of the scenic value is one component of the justification for boundary expansions. Lands outside the park boundary do contribute to the overall park viewshed, and recently harvested timber lands may have an adverse effect to the experience of park visitors by detracting from the scenic views.

Visitor Use and Access, Boundary Adjustment

Comment: The peak tourist season provides seasonal jobs and is an economic boost to the retail and service sectors in our region but the visitor numbers have been declining. The *Draft General Management Plan* does not explain why the visitor count is declining or how a park boundary expansion would increase visitor numbers. Please provide us with your analysis of how park expansion will benefit the tourist economy and your justification of that benefit against the loss of family wage jobs from the timber industry!

Comment: Your *Draft General Management Plan* states on page 263 that "expansion of the park boundary at Ozette could open up privately owned lands to recreational use by park visitors." Your document fails to recognize that private forest land owners do have recreational programs and they do open their lands to the public.

Response: We will clarify in the environmental consequences section of the plan (pages 183, 221, 255, 294, 331) that recreational activities, such as hunting, bicycling, and ATV use, occur on private forest lands. Some of these uses will be altered once the land is within the park boundary, and some additional opportunities could be provided.

Comment: How will park visitor use be managed alongside industrial forestry use (at Lake Ozette)? Improvements of current roads would have some adverse impacts on the lands that the *Draft General Management Plan* proposes to protect. Roads that currently serve industrial forestry operations must not be modified in any way that adversely affects forestry operations.

Response: The National Park Service currently manages acres adjacent to commercial forest lands (e.g. Kalaloch, Ozette, Lake Crescent) and does provide special use permits for access to logging areas. Visitor use in the park is generally not impacted by access permits for logging. The Park Service will continue to work with the commercial forest industry for access permits to logging areas within park boundaries regardless of any future boundary adjustments.

HABITAT PROTECTION

Comments: On pages 209, 246, 283, 285, 320, 322 you state: "On the Olympic Peninsula, habitat loss and disruption are the most common reasons for a terrestrial species to become threatened or endangered. Loss and fragmentation of habitat is occurring in the Olympic region as a result of logging, agriculture, and urban development." This statement perpetuates the false impression that forest harvest, as part of the managed forest landscape, "fragments" habitat. A scientific conference held in 1999 addressed fragmentation in relationship to forest management and the consequences for wildlife populations in the forests of the western United States and Canada. It concluded that the negative effects of fragmentation on wildlife associated with forest land use changes in Midwestern and eastern parts of North America are not apparent in western forests managed for timber production, where older and younger forests are juxtaposed on the landscape. Private lands in the area under consideration for addition to the park have been in forest management for more than 100 years.

Wildlife assemblages and use patterns have certainly changed from pre-settlement conditions, but the current managed forest landscape supports a wide variety of habitats and species that is not expected to change as a result of continued sustainable forest management. In fact, habitat complexity is increasing on lands managed under the Washington State Forest Practices Habitat Conservation Plan as a result of forest practices rules in place since 1976 and the more recent additions to those rules. The recent Forests and Fish Rules more than triple the amount of riparian area and other set asides to more than 20% of the landscape in areas with a high density of streams. "Logging" must be removed from this statement.

The plan states, without any detail or corroborating evidence that "adverse impacts on wildlife are occurring in the Olympic region as a result of logging..." The *Draft General Management Plan* completely fails to acknowledge or address how the "Forest Practice Rules," the *Habitat Conservation Plans*, and other actions of timberland owners improve habitat and manage for wildlife.

Response: Under the existing "Forest and Fish Regulations," there are few specific standards for wildlife management on private lands, particularly in upland areas. Recommendations for upland

management areas include retention of at least 2 acres per 160 acres harvested, in which trees and accompanying understory vegetation are left intact during the current and next rotation. Additionally, due to the great number of riparian areas in western Washington forests, the regulations project that the riparian reserves will also serve as forested reserves for upland areas. Although the management provisions do accomplish some positive benefits for wildlife communities that require forested habitats—because there is a rapid turnover of forest systems through harvest, succession, and subsequent harvest 40-60 years later—the landscape mosaic on managed lands and the associated wildlife communities will be different from what would be found in unharvested systems. Although most wildlife species native to the Pacific Northwest are able to persist in the temporally and spatially shifting habitat mosaic that exists on managed lands, not all species do. In addition, relative abundance of species that remain is often different from unharvested controls (Aubrey et al. 1997).

Some wildlife species (e.g., marbled murrelets, northern spotted owls, Vaux's swift, pileated woodpeckers) depend on forest structure that can only be achieved in older forests containing large live trees, snags, and downed wood. In a landscape that has been through several rotations in which the maximum tree age is 50 years, those elements will become increasingly rare and eventually absent. Consequently, the species that depend on those structures will be unable to persist on those lands.

Lehmkuhl and Ruggiero (1991) compiled a list of 93 species tied to old growth forests and rated risk of local population extinction due to fragmentation. Eighty percent of the species fell in the moderately high and high risk categories. (Lehmkuhl and L. F. Ruggiero 1991).

Under current management prescriptions, park lands will increasingly become habitat islands, where species that depend on old forests and old forest habitat structures will be isolated.

Comment: Roosevelt elk and black-tailed deer are wildlife species of high interest on the Olympic Peninsula for both hunting and viewing. Populations of these species are highly influenced by the amount of forage available on a year-round basis (Cook et al. 1998). While they occur at low levels within unmanaged forest areas of Olympic National Park, most often within the park they tend to be closely associated with natural openings,

including the alpine zone and areas of natural disturbance such as riparian areas in the valley bottoms and areas of forest mortality from wind throw and disease. Highest populations occur outside the park, however, where larger-scale disturbances associated with timber harvest have created abundant supplies of forage. The shifting mosaic of interspersed foraging and hiding cover areas resulting from timber harvest create ideal conditions on a continuing basis for these species.

Response: The author is correct in the statement that elk on the Olympic Peninsula are limited by the availability of good quality forage. However the author is incorrect in the statement that elk and deer populations occur at low levels in the unmanaged forest of the park. Densities of elk are estimated to be from 4.3 to 7.6 elk/km² on winter ranges below 425m (about 1400 ft). Elk populations have remained stable in the Hoh and Queets Valley since comparable surveys were first implemented in the mid-1980s (Jenkins et al. 1999; Houston et al. 1987).

Although riparian habitats and alpine meadows are key habitats for park ungulates, these animals also make extensive, year-round use of late seral forest, where forage is available all year long (Happe 1993; Jenkins and Starkey 1984). The National Park Service does not concur with the statement that the shifting habitat mosaic that follows timber harvest creates ideal conditions for elk and deer. Elk were numerous and widespread on the Olympic Peninsula before settlement by Europeans and before industrial timber harvest began, under environmental conditions that persist today in the park.

Comment: The absence of timber harvesting, (expected under the Olympic National Park expansion proposal) will result in a landscape dominated for many years by middle-aged forest stands, which, because of the limited amounts of available forage, is the least productive stage of forest development for deer and elk.

The statement on page 109 concerning elk migration and stating that elk are easy prey to hunting pressures outside park boundaries is misleading. The Quinault Nation's elk tagging program indicates that this is not true. Elk use the park out of proportion to the available habitat in order to avoid hunting pressure.

The creation of “no harvest” zones alters the behavior of elk and deer. When elk discover an area where they are not subject to predation, they spend too much time in those areas degrading the habitat through overgrazing. The Quinault Indian Nation has a tagged herd of elk that spends over 90% of its time in the park, emerging only in the late winter and early spring when the forage is gone in the park and they are nearly starving. These elk are gaunt and display reduced reproduction compared to those animals living outside the park. This over utilization of a small part of their habitat is detrimental to

Response: We know from past research in the Queets and Hoh that elk reach their lowest nutritional level in late winter and early spring, so the condition described here is not unusual for elk on the Olympic Peninsula. We also know that overall poor nutritional quality is a driving factor for elk populations on the peninsula, both inside and outside of the park (WDFW 2004).

We know that elk social structure, movement patterns, and behavior differ between herds in and out of the park (Jenkins and Starkey 1982). These differences are due to differences in forest management regimes (harvest vs. no harvest) and habitat management (stable forage base vs. shifting forage base following timber harvest).

We submit that the behavior observed in the park is a more natural baseline, against which characteristics of elk in managed landscapes can be compared. The goals of the *Washington Olympic Elk Plan* (WDFW 2004) are (1) to preserve, protect, perpetuate, manage, and enhance elk in their habitats to ensure healthy, productive populations, and ecosystem integrity; (2) to manage elk for a variety of recreational, educational, and aesthetic purposes; and (3) to manage the elk herd for a sustainable yield.

In 2004 there were an estimated 8,600 elk on the peninsula outside the park, and 3,000 to 4,000 elk residing in the park. The National Park Service submits that the majority of the peninsula’s elk are subject to human harvest, and that there is enough room on the Olympic Peninsula for elk herds to be managed under differing prescriptions and objectives. Elk in the park provide the opportunity to 1) protect elk in perpetuity, 2) observe and understand elk ecology in an intact ecosystem, and 3) provide the public with a unique opportunity to observe and photograph elk.

It is true that most of the lands in the proposed boundary expansion areas have been harvested and are at various stages of forest succession. We also recognize that the middle stage of succession (often called stem exclusion or closed canopy stage), has little to no vegetation in the understory or midstory, and does not support many wildlife species, including deer and elk.

Without intervention, it takes a long time for natural processes (e.g. tree death, wind throw) to open the canopy enough to allow growth of a sufficient understory. Active forest management, such as thinning, can open the canopy at an earlier stage. Research has shown that thinned stands can provide forage and cover needed for a variety of wildlife species, including deer and elk, and increase the usefulness of second-growth stands.

Comment: Extending the boundaries will increase the predators which will kill more than we want of our big and small game animals.

Response: The number of large animal predators on the peninsula and in the park is not well known, mainly because they are very difficult to study. Since there has been no wildlife harvest in the park for many years, park biologists assume that the park supports the number of predators that the existing prey and habitat base can support. The numbers of bears and cougars observed in the park, and the number of reported incidents involving them has stayed stable over the past five to ten years (as long as we have been keeping modern records.)

Wildlife outside the park is managed by the Washington Department of Fish and Wildlife and the tribes. There is no data to indicate that predator numbers are changing outside the park either.

Comment: One management strategy would be to work with the U.S. Forest Service and corporate timber managers to develop migratory corridors to protect native wildlife. This could include restricting vehicle access, logging, or hunting on these lands, and would allow species to safely migrate unimpeded to and from the coastal portions of the park and the inland portions of the park. These migratory corridors could actually be relocated as needed through a flexible and adaptive approach that would allow timber managers to manage their resources for their purposes while at the same time meeting the resource protection mission and goals of the National Park Service.

Response: This is a strategy that Olympic National Park would be willing to undertake. National parks are integral parts of larger ecosystems. Fish and wildlife species utilize available habitat on the Olympic Peninsula irrespective of land ownership or management jurisdiction. National Park Service *Management Policies 2006* (Sec 1.6) recognizes the importance of working with adjacent land managers in cooperative conservation efforts "...to increase protection and enhancement of biodiversity and to create a greater array of educational and appropriate recreational opportunities." The "Parkwide Policies and Desired Conditions" portion of the *General Management Plan* for Olympic National Park for ecosystem management and native species similarly expresses this goal and the policies and conditions are relevant to all alternatives.

Habitat Protection — Cumulative Effects

Comment: The *Draft General Management Plan* states, "Slope failures and increased sediment delivery on private lands associated with roads and timber harvest can adversely affect hydrologic resources. Timber harvesting and road building have substantially affected slope stability and fluvial erosion on lands adjacent to the park. Increased sediment delivery to streams has changed stream channels and aquatic habitat and also affected coastal ecosystems." Are you making these comments based on past or current conditions? In the past 20 years the forest industry has been very proactive in addressing problems associated with harvesting timber and building forest roads. "Forest and Fish Rules," road maintenance and abandonment plans, and habitat conservation plans have focused on fish habitat and water quality improvements. It appears your draft was written about the past and not the present.

Response: The text quoted by this comment is relevant to past and current conditions, although certainly advances have been made. The 1997 Department of Natural Resources *Habitat Conservation Plan* and the 1999 *Forest and Fish Report* provided the basis for sweeping modifications to forest practices on state and private timberlands in Washington. In some cases, these revisions improved forest regulations to protect fish and other resources that depend upon a healthy forest ecosystem. For example, under the "Forest and Fish Regulations," strengthened regulations for road construction and maintenance

ensure that all stream crossings provide adequate protection for fish passage and that road drainage systems minimize the potential for catastrophic road failure or delivery of sediment to streams. However, in other cases, environmental effects that will occur from the changes are difficult to evaluate, or are a step backward from rules that were in effect under the Timber, Fish, and Wildlife Agreement.

One shortcoming of the new forest practice rules is the loss of watershed analysis as an effective tool to assess cumulative impacts within a basin. Although the results of watershed analysis can still be used voluntarily, the new riparian regulations and road management plans supersede any watershed analysis prescriptions developed under the Timber, Fish, and Wildlife Agreement. This means that the ability to manage lands on a watershed scale, considering site-specific conditions and cumulative effects, is essentially lost. Additionally, limited or no buffers are required on portions of streams considered to be non-fish bearing. In addition to erosion that still occurs as a result of past management practices (Herrera 2006); even small streams that lack sufficient buffers can collectively contribute a large amount of sediment to the larger streams (May and Gresswell 2003).

With increased precipitation and winter storm events that are predicted to occur with climate change in the northwest (Salathé, 2006), these effects may become more pronounced. The 2007 work plan for the Cooperative Monitoring, Evaluation, and Research Committee (Cooperative Monitoring, Evaluation, and Research Committee) acknowledges high uncertainty and high risk associated with the adequacy of the small stream buffer prescriptions to protect water quality and amphibians (Cooperative Monitoring, Evaluation, and Research Committee 2006). Additionally, the influence of past land use on current stream conditions and biota may last far longer than expected (Harding et al. 1998).

Comment: Since the announcement of the potential boundary adjustment, all private timber lands that can be logged are being logged.

Response: Logging schedules are outside the scope of the planning process. It is unlikely that the proposals in the *Draft General Management Plan* have increased or modified previously planned logging schedules.

LAWS, REGULATIONS, AND OTHER PLANNING DOCUMENTS

Laws, Regulations, and Other Planning Documents — Recognition of Forestland Practices

Comment: The Washington Department of Natural Resources and local timber companies should be commended for their efforts to comply and implement all of the mandates involved with fish and wildlife habitat and the water quality through “Forest Practice Rules” and the *Habitat Conservation Plan*. Their stewardship of the land to ensure forestland protection while trying to balance this renewable resource economically has been a tremendous challenge. Their earnest efforts should be acknowledged and applauded rather than ignored by your draft plan.

Response: It is recognized that the Washington “Forest Practice Rules” provide a level of protection for watershed and fisheries function not realized under previous rules. However, the National Park Service’s primary mandate requires that resources be protected “unimpaired for the enjoyment of future generations.” Therefore, levels of uncertainty inherent in the rules (like protective measures for type N streams discussed in previous comments) fail to provide assurances that park resources will be protected to the mandated standard. Further, the rules do not address conversion of lands to other uses over time, where those other uses could be less sensitive to natural resource needs than forest practices. Acquisition, coupled with active management to achieve desired conditions, provides certainty and prevents conversion to less beneficial uses.

Comments: The *General Management Plan* fails to incorporate and review critical and historic documents associated with private and state timber land management that address concerns used to justify the land expansion. The *Washington State Department of Natural Resources Habitat Conservation Plan* (1997) was approved by the federal services and addresses timber harvest activities, land management activities, conservation strategies for the Olympic Experimental State Forest which includes those Department of Natural Resources lands located in the Lake Ozette proposed expansion. The Washington State Forest and Fish Act adopted in 1999 by the State Legislature requires timber land owners to take

specific actions to address real and potential impacts to salmonid habitat across the state. The *Washington State Forest Practices Habitat Conservation Plan* (2006) should also be reviewed and incorporated.

The *Habitat Conservation Plan* signed by the Departments of Interior and Commerce provides an incidental take permit to the state for activities compliant with the state's forest practices, while the Washington State Department of Natural Resources provides policies and procedures associated with short- and long-term deferral of "mature (old-growth) forests."

The City of Forks would specifically ask for correction of this portion of the *General Management Plan* to reflect or cite the scientific data relied upon for these assertions, to indicate whether the scientific data reflects the current forestry regulations in the state that have received federal services support, and to correct the *Final General Management Plan* as necessary as a result of additional analysis undertaken with a thorough understanding of these critical documents as they relate to legal and permitted private and state harvest management activities. (Washington State Forest Practice Act (RCW 76.09 WAC-222-24, WAC 222-30, WAC 222-50-010) and the Washington State Habitat Conservation Plan ensure the protection of water quality and riparian resources (ESHB 2091 The Forests and Fish Law).

The public comment record reflects a serious concern, stated primarily by representatives of the timber industry, that the *General Management Plan* fails to acknowledge provisions of the Washington State Forest Practices Act and the *Habitat Conservation Plan* as adequately meeting compliance with the Endangered Species Act protective measures. The general management plan process should further discuss these habitat conservation requirements and analyze their adequacy when applied to lands subject to the general management plan.

Key elements of the “Forest and Fish Rules” which ensure that forest management activities protect aquatic resources and lead to improved aquatic habitat conditions include expanded stream protection rules’ protection of unstable slopes’ and road maintenance and abandonment planning focused on achieving fish passage and water quality improvements. An adaptive management element is included which will direct changes to the

regulations if research and monitoring indicates that the new standards are not being achieved.

Since these initiatives have not been considered, or even acknowledged in the *General Management Plan*, the requirement, under park policy, that an expansion of park boundaries requires a determination that other alternatives for management and resource protection have been considered and are not adequate (Appendix B, p.369 *Olympic National Park General Management Plan*), has not been met.

Response: The above mentioned documents have been reviewed and incorporated into the *Final General Management Plan* and have been used to update the information provided in appendix B.

The intent of the boundary adjustment was not to call into question the current forest practices, but to protect the land and park resources from future changes outside the realm of forest management, such as development. Recent years have seen a rapid conversion of traditional forest lands to other uses, therefore the long-term future of these areas as forest resource lands cannot be assured. It is timely and important to include these lands in the proposed boundary adjustment during this planning process.

Olympic National Park is not the regulatory authority to determine adequacy of the *Forest Practices Habitat Conservation Plan* to meet compliance with the Endangered Species Act on lands outside of the park. NOAA Fisheries and USFWS have already issued permits for these under different sections of the Act. Actions to implement the preferred alternative of the general management plan (such as habitat restoration within boundary-expansion areas) will be subject to Section 7 consultation under the Endangered Species Act. Active restoration of lands that may be added to the park will result in more rapid habitat recovery for listed species.

Laws, Regulations, and Other Planning Documents — State Cultural Resource Protection and Management Plan

Comment: The basic functions of the *Washington State Cultural Resource Protection and Management Plan* involve largely voluntary actions designed to foster improved communication and mutual respect between the state, tribes, and landowners; provide

cooperative processes to protect and manage cultural resources; and provide educational opportunities to foster trust, commitment, and understanding. Memoranda of Understanding, signed documents that describe the verbal agreements between landowners and tribes, are cited in the plan as the preferred pathway to protect cultural resources.

On pages 212, 249, 288, 325 of the *Draft General Management Plan* you state: "Logging activities as well as the development and expansion of communities near the park have also disturbed archeological resources outside the park boundaries." This statement must be removed from your *General Management Plan*. The Department of Interior's *Final Environmental Impact Statement for the Forest Practices Habitat Conservation Plan*, dated January 2006, Chapter 4.13, recognizes the extensive regulatory and voluntary practices private forestland owners operate under in order to protect archaeological, historic, and cultural resources. The Washington State Forest Practices Regulatory Program regulates forest practices in the state, including forest practices affecting archaeological, historical, and cultural resources on both private and state land. In addition to the regulations, the *Cultural Resource Protection and Management Plan*, written and agreed to by Timber, Fish & Wildlife participants on July 3, 2003, provides a process to enhance protection of cultural and archaeological sites on managed forestlands.

Response: The National Park Service recognizes that the Washington State *Cultural Resource Protection and Management Plan* provides a degree of protection to cultural resources, including archeological sites. However, the items related to cultural resources are voluntary, and provide no active inventory and evaluation of resources, and are only able to provide protection after resources are discovered during logging.

Much of the logging surrounding the park was done in a period when these regulations did not exist. We will modify the statement to read "until recent years" logging activities as well as the development and expansion of communities near the park have also disturbed archeological resources outside the park boundaries. Recent agreements, including the Department of the Interior's *Final Environmental Impact Statement for the Forest Practices Habitat Conservation Plan*, dated January 2006, Chapter 4.13 (2006) and the Washington State *Forest Practices Regulatory Program's Cultural Resource*

Protection and Management Plan (2003) have significantly reduced these impacts.

Laws, Regulations, and Other Planning Documents — SEPA and Class IV Regulations

Comment: Private timberland that fall within the park boundaries immediately loses value because of the Washington State Environmental Policy (SEPA) and state forest practices acts. Under these policies the Olympic National Park would have a say on when, where, and how private timber is managed. Even if the Olympic National Park is politically sensitive enough to not do this, the SEPA process gives any anti-timber or pro-park organization, for example the Wilderness Watch, Olympic Park Associates, National Parks and Conservation Association, or the Public Employees for Environmental Responsibilities—who are using the Wilderness Act to challenge the Olympic National Park's plans to protect cultural resource—a very convenient and inexpensive appeals process that will gridlock any private forest timber harvest plans. Not only will we become a "willing" seller, but we will also be compelled to sell at significantly reduced prices. This is because the yellow book federal appraisal guidelines require valuation net of regulatory restrictions. In effect, the Olympic National Park or pro-park organizations can influence the land and timber valuation.

If the boundaries are adjusted prior to acquiring the private land within, it would put an additional hardship on the landowners. The landowners would have to go through a Class IV Special Forest Practice Permit (WAC Chapter 222-15) to harvest their timber. If the National Park Service never acquires the land, this permitting process could last forever. Any such compliance requirements will reduce revenues to private shareholders as a result of the private companies having to expend funds to meet these additional administrative requirements.

Response: The National Park Service never intended that lands within the adjusted park boundary would be required to go through the Class IV Special Forest Practice Permit for timber harvest. We have modified the language in the final plan (pages 41-47 of the final plan) to clarify the strategy for boundary adjustments. The National Park Service will work within the legislative framework to adjust the park boundary only after lands are acquired from willing sellers. This should negate any potential loss of value to private

timberlands and the lands under private ownership will not fall under Class IV regulations as a result of the expansion of the park boundary. Furthermore, the National Park Service does direct the appraiser to disregard any "project influence" based on special limiting conditions associated specifically with private property that is within a national park boundary.

Comment: The exchange of 44,000 acres of private timber land for mineral rights in Olympic National Park is absolutely unnecessary. The likelihood of any private entity performing mineral or oil exploration in Olympic National Park is laughable. The environmental community along with the National Park Service would establish legal hurdles that would be nearly financially impossible to overcome.

Response: The commenter is correct that currently the state is, in all practicality, excluded from realizing any benefits from the mineral rights included in the park. However, there is always the chance that, with future changes in resource availability, economic needs or public demands, laws and regulations could change and make mineral exploration feasible within the park.

It is also recognized that the state is not gaining any revenue from these mineral rights. That is part of the rationale behind this alternative: through the preferred alternative, the state and trust beneficiaries will gain new and more manageable revenue from these exchanged mineral or subsurface interests. The proposal will then guarantee that there will be no future threat from mineral exploration in the park, and there will be no confusion over the management of subsurface rights within the park.

Comment: The plan does not address certain parcels that have protective reserve characteristics but are not directly connected or linked to current park boundaries - and also how will these be managed in the event the connecting parcels are not acquired through a willing seller.

Response: Lands included in the boundary adjustment will be adjacent to existing park boundaries. The National Park Service will work within the legislative framework to adjust the park boundary only after lands are acquired from willing sellers.

Legacy Forest Concept

Comment: The *General Management Plan* uses the term "Legacy Forest"; National Park Service staff (Richard Wagner) at the Forks open house for the general management plan noted that this was something proposed by Washington State Lands Commissioner Doug Sutherland. However, that is not an accurate reflection of what Commissioner Sutherland proposed and in fact, appears to either commandeer the Sutherland proposal, or confuse people regarding the intent of the National Park Service proffered block. The Sutherland "Legacy Trust" was one that would be actively managed per Department of Natural Resource's regulatory and trust mandates for the purpose of generating new revenues for recreation and conservation. The Sutherland trust was a unique attempt to create a source of "continuous funding to support recreation on Department of Natural Resources-managed lands and to support stewardship for Department of Natural Resources-managed natural areas." (Department of Natural Resources Fact Sheet No. 02-143, 18 Sep 2002). The Sutherland proposal made it very clear that this trust would consist of lands comprised of "commercial forestlands" that would be part of the "working landscape" while generating revenues for a specific function "similar to how other state trust lands support specific beneficiaries such as schools." Id.

The proposed exchange, specifically the proposed Legacy Forest elements, does not appear to comport with the federal and state *Habitat Conservation Plans* and specifically the Olympic Experimental State Forest components.

To put restrictions on how traded land will be used sets a bad precedence for states' rights. Why does the Park Service believe it is a better manager of these lands?

The draft plan mentions Forest Stewardship Certification management for lands that would be acquired for Washington Department of Natural Resources from privately owned timberland that Olympic National Park would hope to buy and trade for scattered mineral rights held by the Department of Natural Resources. The Department of Natural Resources has a constitutional mandate to manage their assets to produce income for various trust beneficiaries. The Park Service has no business mentioning Department of Natural Resources management practices in this draft plan. (pg. 35)

In asking National Park Service staff about this proposed exchange and whether or not it would be eligible for Department of Natural Resources regular management, the response seemed to indicate that this exchanged block would be subject to conditions and terms set by National Park Service. The amount of this proposed transfer — being approximately 44,000 acres per the *General Management Plan* on page 379 — would be approximately 15-20% of the entire Olympic Experimental State Forest. Such a bargain may run afoul of the *Habitat Conservation Plan* by creating a significant land mass within the Olympic Experimental State Forest subject to different management requirements than the *Habitat Conservation Plan* and in effect zoning 44,000 additional acres in the Olympic Experimental State Forest.

Response: The National Park Service incorrectly used the term "Legacy Forest" instead of the term "Legacy Trust Forest" which was a concept originally introduced by Commissioner Sutherland. The intent of the proposal was indeed to support a creative management concept that would be consistent with Commissioner Sutherland's management responsibilities and state regulations. However, that term is now no longer applicable to state-managed timber lands. This reference has been stricken from the plan. If the exchange occurred, the Washington Department of Natural Resources will manage the lands as they see fit, similar to other state trust lands.

The National Park Service will have no jurisdiction of the approximately 44,000 acres of lands that will be exchanged with the state. Land traded to the state of Washington will be totally managed by the state as they see fit. The goal of the plan is to promote good dialogue and have the ability to work in collaborative relationships with all land managers (including the state) in recognizing the different missions of the agencies, managing to protect important values, and in seeking out areas of common interests for the protection of resources and recreational values etc.

The final plan has been modified on pages 41 to 47 and omits references specifically to the Legacy Forest concept, but keeps exchange and partnership options open. However, the restrictions in a legacy forest may not be any more restrictive than those in called for in the *Habitat Conservation Plan*.

The National Park Service wants to work collaboratively with public and private land owners, tribes, and other partners to protect the Lake Ozette watershed. The final alternative has also been revised to remove references to a specific provision for watershed management; instead it provides flexibility for future negotiations with the Department of Natural Resources to exchange mineral rights within Olympic National Park for other resource values within the state of Washington. Other solutions may be viable.

The trust beneficiaries will be a critical group to solicit information from as this option is further explored. We understand that legislation is required prior to any boundary adjustments, and prior to pursuing this option, a group will be formed to provide input and coordinate any legislation.

Comment: On the private timberlands that Olympic National Park would like to “purchase” or lock up into “Legacy Forest” we practice sustainable consumptive use. That is, people catch fish and keep them and hunt for both recreation and subsistence. These important tribal and local cultural activities will most certainly cease under Olympic National Park management.

It is unclear what goals and objectives would apply to the management of Legacy Forest lands and whether these lands would be open to Treaty hunting and gathering.

Response: The National Park Service incorrectly used the term “Legacy Forest” instead of “Legacy Trust Forest.” which is now no longer applicable to state managed timber lands. This reference has been stricken from the plan (see pages 41 to 47). If the exchange occurred, the state of Washington Department of Natural Resources will manage the lands as they see fit. As with their other Department of Natural Resources lands, it is likely that hunting, fishing, and other recreational activities will continue to be allowed under state regulations.

Olympic National Park is committed to continuing to work with area Indian tribes on a government-to-government basis to address areas of concern and to ensure that existing treaty rights are not affected by actions within the plan.

Legislative Requirements

Comment: State forest lands (a.k.a. county trust lands or forest board transfer lands) would require specific state legislative action/authorization to permit any such exchange. (See RCW 79.22.050, 79.22.060.) Nor, would the proposed exchange comport with the one existing statutory exception to this prohibition on sale or transfer found at RCW 79.22.300. That exception allows state forest lands to be conveyed back to the benefiting county for county park usage with a right of reversion held by the state (RCW 79.22.300). There appears to be no reference to the need for state legislative action associated with any proposed exchange within the *General Management Plan*. This oversight should be corrected.

Response: Final text has been clarified in the *Final General Management Plan* to state that federal and state legislation is required for the land exchange. Appropriate companion state legislation will also be required to assure the revenue from the state lands will continue to provide income to the state trust and will continue to fulfill commitments to county governments and other local taxing districts.

ROAD RESTORATION AND RESOURCE PROTECTION

Comment: Private forest landowners are required to develop road maintenance and abandonment plans that inventory forest roads within their ownership, assess current road conditions, and set a timetable for necessary repairs or abandonment. Since 2000, more than 8,400 road plans have been completed, covering more than 58,000 miles of roads; 775 miles of stream habitat has been re-opened by removing blockages to fish passage.

On pages 203, 239 of the plan, you state: “...unpaved roads outside the park (e.g., logging roads) near rivers and streams can result in increased erosion and sedimentation. These actions adversely affect the movement of water through floodplains and disrupt the natural processes of wetlands and riparian areas, causing long-term adverse impacts.” Logging roads on private forestlands are managed under the *Forest Practices Habitat Conservation Plan (Habitat Conservation Plan)*. The *Habitat Conservation Plan* includes a program that requires a system of forest roads that are well-designed, -located, -constructed, and —maintained, and

protects streams and water quality. The *Habitat Conservation Plan*, through the state's "Forest Practices Rules," ensures that stream banks are protected from erosion, the amount of sediment entering streams is limited, fish passage to upstream habitat is ensured, construction of new roads is minimized, and thousands of miles of unnecessary roads will be removed or abandoned.

By virtue of their existence in a protected watershed, and the restricted areas downstream of the outlet of the lake where spawning occurs, it seems unlikely that land use activities, including logging, are threatening these trout stocks. It is not clear to what extent historic land use activities may have influenced habitat, but as outlined above relative to Lake Ozette, forest practices have become increasingly restrictive over the past several decades. The "Forest and Fish Rules," discussed above in detail, are considered by federal and state agencies and tribes to be adequate for protection of fish habitat and water quality, and are the standard for forest practices carried out in the private land portions of the proposed expansion area. Of particular significance is the rule requirements associated with road management, with their emphasis on addressing road-related fish habitat and water quality concerns. An additional consideration is that inclusion of this area in Olympic National Park is likely to limit efforts to quickly address current problems, such as the loss of the gravel-retaining log jams discussed by Goin (2002).

Response: It is true that the forest practice rules promulgated under the "Forest and Fish Rules" represent a significant upgrade over historical practices, especially in regards to road maintenance and stream crossings. However, roads continue to represent a significant alteration to the Ozette watershed landscape, with the potential to hinder recovery of Lake Ozette sockeye and other fish species in the basin. Roads will continue to alter basin hydrology through the interception of surface and groundwater, delivery of sediment, routine maintenance (especially use of herbicides to control vegetation), etc.

Further, there are currently about 420 miles of road in the Ozette watershed, or 5.5 miles of road per square mile (mi/mi^2) (Draft limiting factor analysis 2007). On non-federal lands only, the road density exceeds $6 \text{ mi}/\text{mi}^2$. The last 20 years have seen a rapid 40% increase in road construction in the Ozette Watershed, from 260 miles in 1987 to the current

420 miles. Even within the last 5 years, since implementation of the new forest practice rules, the number of road miles in the Ozette Watershed has continued to grow (Draft limiting factor analysis 2007). Evidence suggests a strongly negative correlation between road densities and fish production (Sharma and Hilborne 2001; Thompson and Lee 2000; Pess et al. 2002), with densities as low as $1.6 \text{ mi}/\text{mi}^2$ having an identifiable effect on the fisheries resource (Thompson and Lee 2000). Although across the state, the new forest practice rules may result in the removal of "thousands of miles of unnecessary roads," it is not yet clear if there will be a net decrease in the number of miles of roads in the Ozette Watershed as a result of the new rules.

Additionally, it is important to note that many of the guidelines provided in the current forest practice rules, including riparian buffer widths and other guidelines for protecting aquatic resources, were recognized as having uncertain or disputed outcomes. This uncertainty is to be addressed through an adaptive management process which relies upon the work of the Cooperative Monitoring, Evaluation, and Research Committee. The Cooperative Monitoring, Evaluation, and Research Committee has developed a work plan, which prioritizes research needs, and has begun work towards investigating these uncertainties. This work is to be commended. What is yet relatively untested, however, is how the results of the committee's work will be incorporated into revised forest practice regulations. Additionally, it is unclear how or if alternative interpretations of the committee's work, or the work of independent researchers, will be considered. Acquisition of sensitive lands around Lake Ozette or elsewhere around the Olympic National Park boundary will maximize protective measures for fisheries resources and minimize uncertainty.

The inclusion of land in the upper Lyre River by Olympic National Park will not preclude efforts related to the gravel retaining log jam.

Road Restoration Costs

Comment: On pages 240, 279, 315, the plan states: "...the expansion of the park boundary in the Lake Ozette area of the park would result in the restoration and protection of watersheds that flow into the ocean. Reducing the number of existing and maintained roads, and protecting the area from

logging, would likely result in decreased sedimentation at the mouth of the Ozette River." These statements are particularly egregious and must be removed. The state requires that private forestland owners upgrade all forest roads to current state standards by 2016, or sooner if the road is used for hauling of forest products. Furthermore, the Park Service has no obligation to complete its backlog of maintenance projects, unlike the Forest Practices Act requiring state and private landowners to complete road maintenance by 2016. The state rules and timelines will result in better road maintenance by private forestland owners than the National Park Service given your current maintenance backlog.

Roads are part of the legacy of timber harvest. The Olympic National Park would encounter many road-related problems should they choose to acquire the industrial forestlands of the lower South Fork of the Hoh and Owl Mountain. This area has an extensive history of road-related landslides. Engineers from the Washington State Department of Natural Resources are reluctant to decommission many of the roads in this area for fear of having to reconstruct roads to address problems that may occur in the future. They feel that continued road maintenance is the best course of action at this point in time. Would Olympic National Park be willing to have the maintenance staff and equipment to respond immediately when corrective actions are needed?

Response: With any boundary expansion, the National Park Service will be required to inventory the roads and resources in the newly acquired areas, determine restoration needs and priorities, and determine if the areas would be suitable as wilderness. This will follow any land acquisition by willing seller, and the boundary adjustment as part of a land use plan or similar land protection document. This land use plan will be prepared in consultation with tribes, private, state, local stakeholders, and other interested parties/stakeholders. Funding will be sought for restoration work after the planning documents are developed.

The preferred alternative (M32) does not include a proposed boundary adjustment near the South Fork of the Hoh River.

BUDGET

Park Operations and Maintenance Backlog

Comments: Olympic National Park should draft a plan that addresses the current backlog of maintenance and repairs. It should develop a marketing strategy to improve the visitor experience which would include improved facilities, automated or interactive educational programs for remote sites and campgrounds, and improved visitor information centers with automated information and quality printed material.

On February 23, 2006 the U.S. House of Representative, Committee on Resources, stated that "The committee believes that the National Park Service budget must reflect the following priorities: enhancing the visitor experience, increasing access and reducing the maintenance backlog." Olympic National Park should follow that recommendation!

The park cannot currently meet its facility and road maintenance obligations and has a backlog of \$43 million, over 10 times the annual maintenance appropriations. Why add more land when the park cannot demonstrate that the park is sufficiently taking care of the land it already owns?

Response: Olympic National Park is currently working on an asset management plan that addresses facility maintenance and prioritizes the work needed to maintain all the park's assets. This plan, when completed, will assist with park budgeting priorities.

In 2006 the park's appropriated budget, after assessments, was \$10,172,900. Of that, approximately 84% (\$8,564,530) went to facility maintenance, reduction of maintenance backlog, visitor education, visitor protection (such as law enforcement, search and rescue, etc.), and support functions including contracting, utilities, fuel, information technology, human resources and others. In addition, 100% of the maintenance project money that the park competitively obtains is focused on deferred work. Project dollars from other sources are applied to visitor service and education.

The use of fee revenue is mandated by legislation and is also applied to deferred maintenance, visitor experience and education, and the cost of collecting the fees. The Park Service has consistently

addressed, and continues to address the priorities noted by the commenter.

As stated on page 81 of the *Draft General Management Plan*, implementation plans will be developed for action items that are part of the plan, including a comprehensive interpretation plan, which will define a five- to ten-year vision for the park's interpretation program and will address all media and personal services, including visitor center operations, print publications, and automated information.

Park Staffing and Budget

Comment: Comments under park staffing and budget, page 231, are improper and imply that Olympic National Park does not have enough funds to continue normal operations in the future. However, the facts show the National Park Service and Olympic National Park have received increased funding each year for at least the last five years. The problem is with how Olympic National Park chooses to spend its money.

Response: The comment that the park has received increased funding each year for the last five years is accurate. Unfortunately, these increases have not kept pace with inflation, nor have they covered the increased costs of park operations or the full cost of pay increases mandated by Congress. Increased operational costs include rising fuel and materials prices, increased costs in health and other benefits and costs passed on to the park to help fund regional and national programs. These illustrate a few of the impacts related to the shrinking purchasing power of the dollars received by the park. Cuts must be made in any discretionary programs still remaining, resulting in fewer seasonal staff, fewer education programs, and shorter hours of operation.

In the last three years the Park Service has made the conscious decision to leave over 30 permanent positions unfilled after employees retired or transferred. Funds saved through that decision have been used to fill seasonal positions and cover the increase in fixed costs. Unfortunately purchasing power continues to decline. Therefore, the information included on page 231 is accurate.

Comment: A greater percentage of park's budget should go to natural resources education. More

rangers and interpreters should be available to educate the public.

Response: Ideally, the park would have additional staffing and would provide more education programs for the public in both natural and cultural resources. Within the preferred alternative in the *Draft General Management Plan* (page 68), we propose an increase in education staff and the development of partners to explore education and outreach options. However, no funding is guaranteed for the implementation of the plan at this time.

CLIMATE CHANGE

Comment: The plan states that human activities are producing global climate changes. This is an irresponsible statement and has no place in a government-sponsored document. There are many opposing scientific views on this topic. What source did you use to justify making this statement?

Response: There is a wealth of scientific information showing that human activities do influence climate change. According to the 2001 and 2007 reports by the Intergovernmental Panel on Climate Change, there is no scientific debate that human activities have been increasing the concentration of greenhouse gases in the atmosphere.

According to NOAA (Jan 9, 2007 release), U.S. and global annual temperatures are now approximately 1.0 degree (F) warmer than they were 100 years ago, and the rate of warming has accelerated over the past 30 years. While many factors influence global climate, scientists know that certain gases (CO₂, methane, and halocarbons such as CFCs) have a significant effect (Intergovernmental Panel on Climate Change 2001).

While there will always be disagreement among scientists on any topic, the topic of climate change has a tremendous amount of consensus. In fact, in his paper, "Climate Change: Three Degrees of Consensus" (Science 305(5686):932-934; 2004), Richard A. Kerr reviewed 928 scientific studies of climate change, and found that not a single paper disagreed with the consensus of the Intergovernmental Panel on Climate Change, the National Academy of Sciences, and the public statements of professional scientific societies that

global warming is occurring, and that human activities are the primary cause.

Global warming in recent decades has taken global temperature to its highest level in the past millennium (Mann et al. 1999). There is a growing consensus (IPCC 1996) that the warming is at least in part a consequence of increasing anthropogenic greenhouse gases.

Comment: Identify and address the impacts of climate change, with particular attention given to species inhabiting areas on the edge of their temporal range.

Response: The National Park Service continues to gather scientific data to address the long-term effects of climate change. Cumulative effects of climate change were addressed for the appropriate topics (i.e. geologic processes) where known impacts are occurring. Unfortunately, not all impacts of climate change are known at this time.

Comment: Conclusions related to fish and wildlife, and to vegetation, are vague and based on theories (such as global warming) which are disputed by many respected scientists.

The conclusion statements within the environmental consequences section are based on the potential effects of the proposed actions, plus the potential effects from past, present, or future foreseeable actions that may occur within and outside the park boundaries, and could have a cumulative effect on park resources.

CONSULTATION AND COORDINATION

Comment: No reference to local government consultation can be found within the *Draft General Management Plan* regarding the preferred Lake Ozette alternative (See *Draft Environmental Impact Statement* pages 354-356). When National Park Service staff was asked whether or not such entities were contacted, they informed City of Forks staff that they would be in the future.

Response: Chapter 5 includes information on consultation and coordination.

As stated on page 353, scoping for the general management plan was initiated in 2001. Between

2001 and 2006, numerous public meetings were held throughout the Olympic Peninsula and in the region to discuss issues and explore potential alternatives for the general management plan. There were approximately 1,100 individuals, interest groups, and government entities on the mailing list at that time, including state and local governments. Those included on the mailing list received periodic information and updates on meetings, alternatives, handouts, and other planning updates. During that time, the National Park Service met with area communities and governments at their request.

In addition, consultation occurred with federal, state, and local entities throughout the process, both before and after release of the draft plan, as stated on pages 354-355. The National Park Service did discuss the alternatives with the Washington State Department of Natural Resources, and included proposed boundary adjustments in the preliminary alternatives, released to the public in Newsletter #3, May 2003.

Developing the *Draft General Management Plan* involves one step in the ongoing consultation process. Should any alternative be selected that involves boundary adjustments, further consultations with governments will occur as land protection plans and other implementation plans are developed.

Public Workshop Format

Comment: The format of this hearing forces citizens to present their comments in isolation. Why does the National Park Service use this type of public workshop instead of a public hearing?

Why was there only one open house in Gray's Harbor County? Why does King County have an open house?

Response: The open house-workshop-meeting format was specifically chosen in order to maximize the opportunity for people to comment on and discuss the plan. This type of meeting is designed to allow as many people as possible to meet and discuss their questions and concerns with park staff. While some individuals are skilled at public speaking or may prefer the opportunity to testify in a public hearing format, most people are more comfortable with small group or one-on-one conversations with park staff.

Nine public open house workshops were held in August 2006 to gather public input and response to the *Olympic National Park Draft General Management Plan/Environmental Impact Statement (Draft General Management Plan/EIS)*. Seven workshops were held in communities within counties immediately adjacent to the park (Clallam, Grays Harbor, Jefferson, and Mason), while two others were held in the nearby counties of Kitsap and King. These sites were specifically chosen in order to provide a range of options for park neighbors and visitors to attend at least one of the workshops.

A workshop was held in King County in order to provide Puget Sound area visitors with a nearby opportunity to participate.

Nearly 300 people attended and participated in these workshops: meeting and discussing the plan with park staff and providing valuable input. This information has been included in Volume 2 of the *Final General Management Plan*.

COSTS

Comment: The credibility of your plan would be greatly enhanced if you were to include in the appendix a line item budget of the capital improvement and operations and maintenance budgets for the preferred alternative. In the interest of full disclosure, the budget for preparation of the *General Management Plan* itself should also appear in the appendix.

Response: Because the *Draft General Management Plan* is a conceptual plan, detailed cost estimates are not completed on individual alternatives. Since the plan is intended to be a twenty-year plan, any detailed cost estimates will quickly become obsolete.

Table 3, page 76 in the final plan provides a summary of estimated comparative costs of all the alternatives, including capital development costs and cyclic costs. After completion and approval of a final management plan, other more detailed studies and plans, which will include compliance and public involvement, will be needed (page 81). These include development plans and implementation plans which speak to specific projects and will contain detailed costs, current to the time of actual implementation and completion.

Since the planning process is still underway, cost figures for the preparation of the *General Management Plan* are not yet complete.

CHOOSING BY ADVANTAGES PROCESS

Comment: The plan is vague regarding how costs were considered in the choosing by advantage approach. An objective measure of the likelihood of funding should have been a factor used in the evaluation.

Response: As stated on page 63 of the *Draft General Management Plan*, cost is not a factor at the outset of the Choosing by Advantage (CBA) process. Rather, CBA focuses on the differences between alternatives, and determines the importance of the advantages of each alternative.

The CBA process establishes a scale that compares the importance or benefits of all the alternatives. Cost is then introduced to the priority setting process, establishing an importance-to-cost ratio.

The factors used in the CBA process are predetermined at the national level; a factor related to “likelihood of funding” is not among them. In fact, if “likelihood of funding” were used as a factor in the initial stage, it could seriously impact the overall park mission of protecting resources and providing access to the public, as it could discourage managers from moving forward with needed projects. Further, it would fail to incorporate the possibility of alternative funding sources such as partnerships, donations, or other non-traditional funding possibilities. We recognize that funding may not be available to implement all aspects of the plan (as stated on page 7). However, if funding were to become available, the plan provides direction and guidance for how park management will proceed in the future.

CULTURAL RESOURCES

See also, Wilderness

Archeological Resources

Comment: Under “Archeological Resources” (page 28), there appears to be no strategy as to how the Olympic National Park will approach archeological resources that may become threatened due to the

environmental conditions of the Olympic Peninsula. References to such threats are noted within the “Desired Conditions Specific to Olympic National Park.” However, there does not appear to be an accompanying strategy that outlines an approach to address such a threat.

Response: Page 28 in the *Draft General Management Plan* provides information about how the Park Service will continue to monitor and protect archeological resources. For example, a strategy is articulated to monitor at-risk coastal areas on a monthly, annual, or bi-annual basis.

When monitoring or other activities reveal a threat to a historic property such as an archeological site, the Park Service evaluates the situation and develops solutions that consider both historic preservation goals as well as broader park goals. Area tribes are consulted during this process.

The most common threat to historic properties is river or coastal erosion. Archeological sites have been protected from further erosion by improving bank protection. In other instances, excavation and evaluation has been done to ensure that the importance of the site has been clearly documented. Structures have been protected by documenting, reducing the threat of erosion, and in one case, moving the structures to a more protected location. Graffiti-writing has been an issue at petroglyph sites and some historic structures and has been addressed through increased patrols, education, and quick remediation of any graffiti.

Comment: A priority needs to be put on saving the Wedding Rocks Pictographs. A helicopter and ships could be used to haul them to the Neah Bay Museum, and the Makah Tribe would more than likely help with the finances of the move.

Response: Preservation of the Wedding Rock Petroglyphs is a park priority and strategies for their protection are included in the *General Management Plan* (page 28).

The petroglyph site is actively patrolled and monitored by park staff and threats to the site are mitigated as feasible. However, their beach-front location makes preservation challenging. The Makah Tribe has informed the National Park Service that they do not want to move the petroglyphs, but would rather have them remain in place, exposed to natural processes.

Comment: The *Draft General Management Plan / Environmental Impact Statement* does not mention documentation/tracking/ prosecution of violations of cultural resource laws. This is a vital part of cultural resource management.

Response: We agree. This is definitely a technique that is and will continue to be a vital part of the cultural resource management and law enforcement program at Olympic National Park. We have clarified this strategy in the “Parkwide Policies and Desired Conditions for Archeological Resources” section in the *Final General Management Plan*.

Ethnographic Resources

Comment: The plan includes the statement that the Park Service will “Monitor shell middens and petroglyph sites in at-risk coastal areas on monthly, annual, or bi-annual basis.” This statement is vague and defaults to biannual monitoring in light of perennial budget shortfalls. The Quinault Nation requests monitoring that occurs on at least an annual basis.

Response: One strategy to reach desired conditions for archeological sites is to monitor at-risk coastal areas on a monthly, annual, or bi-annual basis (page 28 of the *Draft General Management Plan*). The frequency of monitoring is driven by the level of risk at each site. For example, because of potential erosion threats, beach-side midden sites are monitored on an annual basis. Shell midden sites located away from the beach and therefore at reduced risk of wave erosion may be monitored at longer intervals.

Where landscape conditions are actively changing and putting cultural and archeological sites at greater risk, park staff works with area tribes to conduct monitoring more frequently. An example of this is the ongoing monitoring at Wedding Rocks petroglyph site.

Comments: The plan includes the statement, “Treat all archeological resources as eligible for listing on the National Register of Historic Places” This approach does not address sensitivity of potential sites to the Quinault Nation, nor does it acknowledge or address the probability of looting (or other desecration) of these sites. In order to protect the integrity of such sites, and given the history of looting publicly known historical sites, the Park Service should defer to the Quinault

Nation's wishes whether to include such sites on a public register.

The Tribe expects interactive dialogues as the Park Service identifies and evaluates cultural landscapes and Traditional Cultural Properties.

Cultural landscape definitions seem to exclude prehistoric landscape features. Prehistoric features such as the Ozette Prairies are being lost due to conflict with wilderness designation and management. The *General Management Plan / Environmental Impact Statement* should evaluate the effects of current and proposed future management on the survival of historic prairies. While natural resources need to be protected, the significance of properties can only be preserved by traditional use, such as harvesting.

Response: As stated on page 30 under “Parkwide Policies and Desired Conditions for Cultural Landscapes,” treatment plans for preservation of significant sites will be developed in accordance with National Park Service policies, standards and guidelines in consultation with the Washington State Historic Preservation Office (SHPO), tribes, and other interested parties in accordance with Sections 106 and 110 of the National Historic Preservation Act (NHPA)

Whenever an archeological site is encountered, it is treated as if it is eligible for the national register, as noted on page 28 of the *Draft General Management Plan*. Treating an archeological site as eligible for the national register without a formal determination subjects the site to Section 106 review under the National Historic Preservation Act. If the park determines that actions could adversely effect the site, then the park must consult with the State Historic Preservation Office, tribes, and other interested parties on appropriate measures to avoid, minimize, or mitigate adverse effects to the site.

Olympic National Park is committed to continuing and improving its communication with area tribes about areas of concern, including protection of archeological resources. This has been clarified in the *Final General Management Plan* in Chapter 1, in the section “Federally Recognized Tribes,” with the text, “The Park Service will pursue open, collaborative relationships with American Indian tribes to help tribes maintain their cultural and spiritual practices and enhance the National Park Service understanding of the history and significance of sites and resources within the park.”

This is in accordance with NPS *Management Policies 2006*.

National Park Service policy is to protect all archeological sites. If an archeological site cannot be preserved in place, some agreed-upon level of data recover, analysis, curation, and reporting is usually appropriate in order to preserve important information about the site that otherwise would be lost. Data recovery would not be undertaken, however, until appropriate consultations with the State Historic Preservation Office, tribes, and other interested parties have occurred in accordance with Section 106 of the National Historic Preservation Act.

The Park Service is committed to consulting with area tribes about archeological sites, no matter what their condition.

The location of sites listed on the National Register of Historic Places can be kept confidential in order to minimize visitation and the risk of vandalism.

Consistent with the intent of the Wilderness Act, and in accordance with *Management Policies 2006*, the laws pertaining to historic preservation also remain applicable within wilderness but must generally be administered to preserve the area’s wilderness character (16 USC 1133(a) (3)). The draft plan has been modified on pages 26, 27, 41, 79 and 118 to reflect the language in *Management Policies 2006* (6.3.8).

Cultural resources, including cultural landscapes and traditional cultural properties that have been included within wilderness, will be protected and maintained according to the pertinent laws and policies governing cultural resources and wilderness, using management methods that are consistent with the preservation of wilderness character and values. The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analyses and decision making concerning cultural resources.

Comment: Under “Strategies to protect archeological resources,” consultation with the tribes is only indicated if disturbance or deterioration are unavoidable. The Quinault Nation requests coordination regarding these activities.

Response: Olympic National Park is committed to continuing and improving its communication with

area tribes about areas of concern, including protection of archeological resources. This has been clarified in the *Final General Management Plan* in Chapter 1, in the section “Federally Recognized Tribes,” with the text, “The Park Service will pursue open, collaborative relationships with American Indian tribes to help tribes maintain their cultural and spiritual practices and enhance the National Park Service understanding of the history and significance of sites and resources within the park.” This is in accordance with *NPS Management Policies 2006*.

National Park Service policy is to protect all archeological sites. If an archeological site cannot be preserved in place, some agreed-upon level of data recovery, analysis, curation, and reporting is usually appropriate in order to preserve important information about the site that otherwise would be lost. Data recovery would not be undertaken, however, until appropriate consultations with the State Historic Preservation Office, tribes, and other interested parties have occurred in accordance with Section 106 of the National Historic Preservation Act.

The Park Service is committed to consulting with area tribes about archeological sites, no matter what their condition.

Comments: In the “Desired Conditions and Strategies” section (page 28), add the following: “Work with the Tribe in identifying and protecting archeological sites within the Tribe’s “Usual and Accustomed Area.” Where Memoranda of Agreement are prescribed regarding impacts to cultural resources, associated tribes should be invited signatories.

Response: Olympic National Park is committed to continuing and improving its communication with area tribes about areas of concern, including protection of archeological resources. This has been clarified in the *Final General Management Plan* in Chapter 1, in the section “Federally Recognized Tribes,” with the text, “The Park Service will pursue open, collaborative relationships with American Indian tribes to help tribes maintain their cultural and spiritual practices and enhance the National Park Service understanding of the history and significance of sites and resources within the park.” This is in accordance with *NPS Management Policies 2006*.

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The Park Service is committed to consulting with area tribes about archeological sites, no matter what their condition. As Memoranda of Agreement are prescribed regarding impacts to cultural resources, the Park Service will consult with the associated federally recognized tribes to be participants in this process.

The following text has been added to page 28: Under the Park’s Section 106 (compliance) and section 110 (inventory and evaluation) responsibilities, the park works with the tribe to identify and protect archeological sites on park property within the tribe’s “Usual and Accustomed Area.”

Comment: We find it unnecessary for the Park Service to introduce nonnative plants for "cultural reasons."

Response: National Park Service management policies state that while exotic species will generally not be introduced or maintained within a park, “noninvasive exotic species may be introduced or maintained within a park to meet specific, identified management needs.” These needs include situations in which a noninvasive exotic plant is “needed to meet the desired condition of a historic resource” ... and is “known to be ... a contributing element to a cultural landscape.”

All invasive exotics are removed from the cultural sites and only a few of the park’s cultural landscapes (homesteads, administrative areas such as resorts and park headquarters) include exotic plants as elements.

Comment: We recommend that you do a global search throughout the *Draft General Management Plan* and wherever "culture," "ethnology," and "archeology" are discussed, include a discussion of

how important the living resources are to the eight tribes of the peninsula, who use the resources for subsistence, ceremony, medicine, clothing, and in the case of fisheries, commerce.

Response: We have reviewed the document and included the information as appropriate in the *Final General Management Plan*. Text has been modified on pages 34, 37, 57, 206, 209, 308, 349, and 432 (page numbers reference the *Final General Management Plan*).

Comment: Is cultural resource staff available for assistance to tribal personnel for joint cultural projects?

Response: The park's cultural resource staff is available and interested in working with tribal personnel on joint cultural projects as time and funding allow.

The *Final General Management Plan* has been updated to reflect this information (see page 37, "Parkwide Policies and Desired Conditions — Ethnographic Resources").

Comment: We recommend continuing efforts to notify our office when projects are planned, and we would like to use our archeologist and monitors for any survey work to be done. We suggest developing a protocol list on how artifacts are handled and where they are housed. We want to house any and all Skokomish /Twana / Tuwaduq artifacts that the Olympic National Park has now and may recover in the future. We would also like to nominate areas of Olympic National Park for either eligible or nominated status to the National Register of Historic Places, possibly as a cultural landscape.

Response: The Park Service will continue to consult with tribes when projects are planned (see pages 12, 28, 31 and Chapter 1 of the *Draft General Management Plan*) as part of NHPA and NEPA process.

While the park does not typically contract for archeological services, the Park Service is more than willing to partner with Tribal Historical Preservation Officers and to have tribal staff work collaboratively together with park archeologists. This information has been updated in the *Final General Management Plan* under "Parkwide Policies and Desired Conditions — Archeological Resources."

Page 32 of the *Draft General Management Plan* has been updated to reflect the park's goal of working with all tribes to ensure proper museum collection storage. Park staff would be happy to work with the tribes in developing a protocol for handling and housing artifacts.

Details of the park's collection policy are described in the park's Scope of Collections statement and are beyond the scope of a general management plan.

Tribes may nominate sites within Olympic National Park to the National Register of Historic Places through the State Historic Preservation Office. Park staff would be happy to collaborate on this process as appropriate and as staffing allows.

Historic Structures

Comment: Appendix E lists "classified structures" to be maintained. Twenty-nine (by our count) are located in wilderness. This list includes at least one structure that is no longer standing. Another 21 "properties" are to be evaluated, including some weathered piles or logs, an obsolete research facility, and a sawmill ruin.

Response: An updated *List of Classified Structures* reviewed by the State Historic Preservation Office and certified by the National Park Service headquarters office in Washington, D.C. is presented in Appendix E.

Comment: Modify the list of buildings in Appendix E to include the date of construction, purpose of structure, and an indication of whether it was built by the CCC or has other historic purpose. Also indicate any necessary historic documentation, maintenance, or stabilization, and determine whether each structure should be included in the National Park Service HABS/HAER program. Perhaps a priority grade should be assigned to individuals structures. Stabilization of backcountry structures should use pre-cut and fabricated natural materials transported to the site using minimal impact means (helicopter drop or ground transport).

Response: The table in Appendix E has been replaced by the park's current *List of Classified Structures (LCS)*. The *LCS* is the primary database containing information about historic and prehistoric structures and contains information (so far as it is known) about a structure's identity,

category of significance, condition, use, threats, treatments, cost estimates for treatments, and physical description.

Information about strategies for addressing management of historic structures is shown on page 29.

Much of the information requested in this comment is beyond the scope of a general management plan and will be addressed in other documents including historic structures reports, which are prepared for every major structure managed as a cultural resource.

Comment: There should be a strong articulation of the philosophy noted on page 79 that "benign neglect would not be considered an appropriate management strategy." This would be appreciated by descendants of individuals whose families settled areas now within park boundaries. In addition, local communities should be consulted prior to the removal of any historic structure through active National Park Service action or approved natural decay.

Response: Parkwide policies and desired conditions for historic structures are described on page 29 in the *Draft General Management Plan*. Management options considered for cultural resources are described on page 79 in the *Draft General Management Plan* and are dictated by the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. Structures listed or eligible for listing in the National Register of Historic Places are protected unless it is determined through a formal process that disturbance or natural deterioration is unavoidable.

The Park Service consults with the State Historic Preservation Office, area tribes, and other interested parties as required under section 106 of the NHPA before any actions are taken on historic structures. Depending on the site and structure, interested parties often include local communities, area residents, and descendants of a building's original occupants.

Historic Structures and Cultural Landscapes

Comment: On pages 29-30 of the draft plan, one continual concern is that the National Park Service does not adequately protect the prairies, former

homestead sites, and pioneer settlement areas within its land base. These sites and landscapes may no longer have specific historic facilities; however, the earlier historic roles they played are still evident via the plants and trees that remain from those pioneer settlements. Efforts should be made to further protect these sites and provide educational information about them. Specific settlement activities within what is now the park do not appear to be referenced or addressed within the desired conditions and strategies: Lake Ozette, Queets Colony, Quinault Homesteads, coastal homesteads, and Upper Hoh areas.

Response: At this time, 27 areas have been identified by the National Park Service as potential cultural landscapes (Appendix F), including most of the homestead areas mentioned above. As funds become available, each of these landscapes will be evaluated to determine eligibility for the National Register of Historic Places. Kestner Homestead is the first cultural landscape to be evaluated; that report is due to be completed by the end of 2007.

As stated on page 30 under "Parkwide Policies and Desired Conditions for Cultural Landscapes," treatment plans for preservation of significant sites will be developed in accordance with National Park Service policies, standards and guidelines in consultation with the SHPO, tribes, and other interested parties and in accordance with Sections 106 and 110 of the NHPA. Interpretive information, including exhibits and brochures, has been developed on several of these sites. The Park Service also has identified a strategy to "Coordinate education programs with partners and focus on improving the general understanding of park natural and cultural resources ...," as noted on page 33 of the *Draft General Management Plan*.

Comment: The remaining heritage sites at Lake Ozette are not addressed in the plan: in particular the lilies at Garden Island.

Response: The National Park Service is making an effort to document and protect the cultural landscapes within the park, including Garden Island. As noted on page 129 of the *Draft General Management Plan*, this effort is not complete. As time and funding allows, we will continue to inventory sites in the Ozette area to identify potential cultural landscapes and we will include Garden Island in the inventory.

For your information, both the native yellow pond-lily (*Nuphar lutea* ssp. *polysepala*) and the nonnative fragrant water-lily (*Nymphaea odorata*) are present in the water surrounding Garden Island. Fragrant water-lily is invasive and is listed as a noxious weed by the state of Washington. It can spread to cover entire lakes and can hinder lake-front access and swimming and would not be acceptable within a cultural landscape, in accordance with National Park Service policies.

Management Policies 2006 directs the National Park Service to manage populations of exotic plant species, up to and including eradication, wherever such species threaten park resources or public health, and when control is prudent and feasible, as stated on page 24 of the *Draft General Management Plan*. Strategies identified on page 24 include completing an inventory of plants in the park, determining if removal and control is feasible, and adopting methods to control these species (see http://www.nwcb.wa.gov/weed_info/nymphaea_odorata.htm).

History of the Olympic Peninsula

Comment: Virtually no credit and only brief mention is made of the early pioneers and their history in the area. Little recognition is given to the smaller communities for their amenities and contributions of knowledge to people who wish to enjoy the park. Brochures for these establishments are hidden from view at visitor centers and only revealed upon insistent query. Only the concessioners' pamphlets are openly displayed. This has been a complaint frequently voiced to proprietors of local facilities.

Response: Settlement of the Olympic Peninsula by Euro-Americans is discussed within the "Affected Environment" section of the document (pages 123-127 of the *Draft General Management Plan*).

The park staff strives to present information about all park resources and has developed brochures, exhibits, and other interpretive materials about the pioneer and homesteading history of the area now included within the park. Additional information about these topics will be developed as funding permits.

Regarding brochures about businesses and amenities located outside the park boundary, National Park Service management policies state

that "Commercial notices or advertisements will generally not be displayed, posted, or distributed on the federally owned or federally controlled land, water, or airspace of a park. A superintendent may permit advertising only if the notice or advertisement is for goods, services, or facilities available within the park...." However, Olympic National Park provides visitors with information about nearby amenities by directing them to area chambers of commerce and tourism bureaus.

Museum Management

Comment: We advocate for a strategy that involves the sharing of the park's museum collection, if not the actual items, then via digital facsimile. The "Community Museum Project" is able to inventory, categorize, and share (via the internet) museum artifacts. Olympic National Park could partner with the University of Washington, Peninsula College, local school districts, tribal governments, and other entities to make this happen.

Response: The Park Service does partner with various community organizations, and will continue to work with others to share and protect park-related museum and archival resources as funding is available. The guiding document for this, as specified in the *Draft General Management Plan* on page 37, is the *Museum Management Plan* (2002), in addition to applicable National Park Service guidelines and policies included on page 32 under "Parkwide Policies and Desired Conditions for Museum Collections."

Comment: Create a museum at Lake Ozette for the display of artifacts from the lake's history.

Response: Current museum planning is promoting consolidation of museum facilities versus the creation of new sites due to funding issues and museum object preservation considerations. Planning for any new museum facility must demonstrate importance of maintaining collections at the site as well as the ability to provide environmental and safety standards that meet current museum facility requirements. There are no plans to create a museum at Ozette.

Comment: The Tribe should be consulted about items that are archived by the National Park Service and other museum entities for items to exhibit at the centers.

The Museum Collections plan does not include tribal consultation for appropriate handling and or restrictions. Consultation is a valuable tool that can enhance interpretation from a tribal perspective and lends to overall respectful relationships between the Park Service and tribes.

Response: The National Park Service is committed to continuing and improving its communications with area tribes and will consult with the tribes on museum management at Olympic National Park. We agree that consultation is a valuable tool and will consult with the tribes when revisions and updates to the *Museum Management Plan* occur.

Olympic National Park is committed to continuing and improving its government-to-government relationship with federally recognized tribal governments (see page 12 of *Draft General Management Plan*). In accordance with the Presidential Memorandum of April 29, 1994 and Executive Order 13175, “Consultation and Coordination with Indian Tribal Governments,” Olympic National Park will continue to work with Indian tribes on a government-to-government basis to address issues concerning Indian tribal self-government, trust resources, and Indian tribal treaty and other rights and concerns. Olympic National Park will work closely with the tribes in implementing the general management plan to ensure that existing treaty rights are not affected by actions within the plan. This has been clarified in the final plan.

EDUCATION AND OUTREACH

Comment: Outreach programs developed by the park staff should actively, collaboratively, and repeatedly involve local schools, tribes, and community organizations in their development, testing, and offering. Efforts should be made to work with local entities, as well as the State Office of the Superintendent of Public Instruction, to ensure such programs are scalable to various grades while fulfilling state learning objectives and standards.

Response: Page 33 of the *Draft General Management Plan* identifies the strategy to “develop outreach programs for and with schools, tribes and community organizations.” The park staff may also seek partnerships with nonprofit organizations, the Office of Superintendent of Public Instruction, state

education service districts, and other governmental agencies that share an education mission.

National and state education standards and grade level expectations have been incorporated into all of the park’s curriculum-based education products since 2002.

Comment: Free web-based education needs to be a must and could be done in collaboration with state and local innovators such as the Washington Digital Commons, the Virtual Community Museum Project, as well as national institutions.

Response: The Park Service agrees that web-based education is important and articulates strategies in the *Draft General Management Plan* to coordinate education programs with partners and to provide web-based education (page 33). Potential partners could include local, state, or national education institutions, government agencies, or nonprofit organization that share an education mission.

Comment: Under "Primary Interpretive Themes" add "Environmental Communications" as a major theme which would include acoustic ecology (sound behavior and animal communications) and environmental education with emphasis on nature listening skills.

Response: The park's primary interpretive themes are based on the park's purpose, significance, and unique resources and represent the broadest, overarching stories about the park. Sub-themes tend to be narrower in scope and are included within the primary interpretive themes. Environmental communications could be a sub-theme within any of the primary interpretive themes, with the strongest alignment to interpretive themes A and B found on page 10 of the *Draft General Management Plan*. However, this level of detailed information is beyond the scope of a general management plan.

Desired Conditions

Comment: Add “Provide interpretive programs and brochures to help visitors become astute listeners and quieter visitors” under desired conditions.

Response: These comments are addressed on page 14 of the *Draft General Management Plan*, which identifies strategies to “provide interpretive programs and materials to help visitors understand

the role of natural sounds and the value of natural quiet” and to “encourage visitors to avoid unnecessary noise...”

ENVIRONMENTAL CONSEQUENCES

Comment: We recommend providing quantitative information to assess current conditions so that there is a better means to measure and predict impacts to water quality (e.g. sediment, temperature, and possible 303 (d) listing), air quality, fish and wildlife, etc. This would provide data and an additional basis to monitor and evaluate management. We recommend the *Final Environmental Impact Statement* provide this type of information and discuss potential resources to collect data where there may be gaps.

Response: Quantitative information was provided where appropriate and where information was available.

The inventory and monitoring of resources is listed as a desired condition and as a strategy for a variety of topics (e.g. air quality, soundscapes, water resources, rivers and floodplains, wetlands, marine resources, geologic resources, native species, exotic species, and rare, threatened, and endangered species). This information is found in Chapter 1.

Currently, the park’s Natural Resources Division maintains data sets from a variety of short-term studies, as well as several long-term monitoring programs (e.g. northern spotted owl, Roosevelt elk, intertidal communities).

In addition, park biologists and cooperators from U.S. Geological Service — Biological Resources Division are currently developing protocols for a long-term ecological monitoring program. Begun in 2001, this program will provide trend information about selected resources and ecological indicators. Data from short-term projects and long-term monitoring are used in management planning and decision making. National Park Service goals for long-term ecological monitoring are to

- Determine the status and trends in selected indicators of the condition of park ecosystems to allow managers to make better-informed decisions and to work more effectively with other agencies and individuals for the benefit of park resources.

- Provide early warning of abnormal conditions of selected resources to help develop effective mitigation measures and reduce costs of management.
- Provide data to better understand the dynamic nature and condition of park ecosystems and to provide reference points for comparisons with other, altered environments.
- Provide data to meet certain legal and Congressional mandates related to natural resource protection and visitor enjoyment.
- Provide a means of measuring progress towards performance goals.

More information about this program is available at: <http://www.nature.nps.gov/protectingrestoring/IM/inventoryandmonitoring.cfm>

Comment: Combined, incremental, cumulative effects of actions are disregarded.

Response: Cumulative impacts are considered for all impact topics and alternatives in the *General Management Plan* and are discussed starting on page 267 of the final plan.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

Comment: Alternative C would be demonstrated to be the preferred alternative if the full range of benefits [economic development] of alternative C were analyzed correctly and completely.

Response: As stated on page 83, the environmentally preferred alternative is not based on cost or economic development, but on a number of criteria as established by section 101 of the National Environmental Policy Act, including resource preservation goals, sustainability goals, and visitor experience goals. As stated on page 63, the management preferred alternative was selected using a combination of factors, not limited to costs, but including the following: protecting natural and cultural resources; providing orientation and education; providing visitor access and recreational opportunities; protecting the health, safety, and welfare of the public and park employees; improving park operational efficiency and sustainability; and compatibility of the park's

actions with its neighbors and the surrounding ecosystem.

Comment: The preferred alternative does not meet NEPA section 101 (b) goal C. Continuing the current alignment and uses of the Olympic National Park road system in the Quinault drainage does not provide beneficial uses without environmental degradation. The preferred alternative does not meet NEPA Section 101(b) goal A or B in the Quinault watershed. The current condition of the upper Quinault River floodplain is not aesthetically or culturally pleasing, and under the preferred alternative it will continue to deteriorate. The only way to achieve NEPA goal A in the Quinault drainage is to implement the River Zone. The preferred alternative does not meet NEPA section 101 (b) goal D in the Quinault watershed. The hydrologic processes would continue to deteriorate. The preferred alternative does not meet NEPA section 101 (b) goal E in the Quinault watershed. A balance between population and resource use is not currently in place and nothing in the suggested actions for the Quinault will achieve that balance.

Response: The *General Management Plan* is a programmatic document that establishes the overall vision for Olympic National Park and does not include site specific analysis. Therefore, the identification of the environmentally preferred alternative is not based solely on one area or one resource. The requirements for the identification of the environmentally preferred alternative are explained on page 83 of the *Draft General Management Plan*. The environmentally preferred alternative is defined as “the alternative that will best promote the national environmental policy as expressed in section 101(b) of the National Environmental Policy Act.” Basically, the environmentally preferred alternative would cause the least damage to the biological and physical environment and would best protect, preserve, and enhance historic, cultural, and natural resources. After the environmental consequences of the alternatives were analyzed, each alternative was evaluated as to how well the goals stated in section 101 of the National Environmental Policy Act are met. The criteria were established by section 101 and the alternatives are compared in table 3 of the *Draft General Management Plan*. Alternative D was selected because it is the alternative that, taken as a whole, would best meet all six goals stated in the National Environmental Policy Act.

Olympic National Park is committed to working collaboratively with the Quinault Tribe to address areas of concern, including restoration of the upper Quinault watershed.

FACILITIES

Comment: Plan D calls for removal of boat ramp at Swan Bay.

Response: Alternative D for Ozette (page M24, paragraph 5.) does not call for the removal of the boat ramp at Swan Bay; rather, it calls for conversion of the area to day use only.

Comment: We support the designation of the northern portion of Swan Bay as “day use.” However, we question why only minimum facilities would be provided at the boat launch. In addition to educational and interpretative information, visitor facilities such as privies, picnic tables, trash receptacles, etc., should be provided and maintained in this area.

Response: The small amount of land managed by the National Park Service at Swan Bay will not accommodate anything other than minimal facilities. However, minimal facilities could include a bulletin board containing orientation and safety information.

Expanding the park boundary in this area and acquiring land from willing sellers only would provide the space necessary to accommodate more facilities.

Comment: The coastal erosion threat and channel migration of Kalaloch Creek are overstated.

Response: As stated on page 99 of the *Draft General Management Plan*, and further clarified in the *Final General Management Plan*, there is a coastal erosion threat at Kalaloch Beach and at the mouth of Kalaloch Creek. In recent years, two guest cabins at Kalaloch Lodge and several campsites in Kalaloch campground have been closed due to unsafe conditions caused by erosion of the bluff by Kalaloch Creek and the ocean.

Global sea level has risen at least 6.72 inches in the past century (IPCC, 2007). Climate models predict an additional sea level rise from 7 inches in the “best case” scenario, to over 23 inches by 2100 (IPCC, 2007).

In partnership with the National Park Service, the U.S. Geological Survey (USGS) completed a hazard assessment of the coastal areas of Olympic National Park in 2004 (see: <<http://pubs.usgs.gov/of/2004/1021/index.html>>).

This assessment evaluates the effects of future sea level change by examining shoreline geomorphology, regional coastal slope, rate of relative sea-level rise, shoreline change rates, mean tidal range, and mean wave height. The analysis classified 30% of the coastal area of Olympic National Park as having a very high vulnerability to future sea level rise, 24% as having high vulnerability, 22 % as having moderate vulnerability, and 24 % as having low vulnerability. The shoreline at Kalaloch Beach, including the mouth of Kalaloch Creek, received a rating of “very high vulnerability” and is expected to continue to erode in the coming years.

Comment: Kalaloch Lodge is a historical landmark.

Response: Although the earliest development of a lodge and beachfront cottages at Kalaloch dates from the first half of the 1900s, major alterations to the complex have occurred since then. The core of the present lodge was constructed in 1953; surviving cottages were extensively altered or removed, and new cottages were added in the 1980s. Although the complex has a long history and is associated with early recreational development along the Olympic coast, the complex was determined not eligible for the National Register of Historic Places because of the lack of historic integrity resulting from these changes.

Comment: What areas are proposed for relocating the visitor center and Kalaloch Lodge and what are the estimated costs?

Response: At this time, there is no area proposed for the relocation of the visitor center or Kalaloch Lodge. A relocation site, along with estimated costs, will be determined through a feasibility study and implementation plan to be developed after completion of the general management plan, both of which will include opportunity for public input. This is discussed on page 81 “Future Studies and Implementation Planning.”

Comment: Alternative C doesn’t seem to take into consideration any revenue generated by increased services by concessioners at the ski resort. Adding a

chairlift or two for skiing would certainly generate additional revenue, as would camping and entrance fees.

Response: Under alternative C, improvements to the downhill ski support facilities might be allowed at the ski area, and this could result in improved recreational opportunities and benefits to visitors, as stated on page 293 of the *Draft General Management Plan*. However, no alternative proposes adding additional services. If improvements such as adding a chairlift are authorized, there would be short-term costs to the concessioners related to these expansions, and increased revenue could occur in the long-term, as stated on page 307 of the *Draft General Management Plan*.

Comment: The removal of approximately 50 to 100 hazard trees each year to maintain the Hurricane Ridge downhill ski area clearly indicates that site should be closed down.

Response: Small trees are occasionally removed from the ski runs, but not every year. In 2006, approximately 100 trees were removed from the ski area for safety reasons. None of these trees was over 4 feet in height. Prior to 2006, except for some minor pruning, trees on the ski runs had not been removed for 12 years. The ski area is zoned a development zone; the removal of these trees is appropriate in areas where skiing is an activity. This activity was evaluated in the “Environmental Consequences” section of the *Draft General Management Plan* on pages 206, 242, 281, and 318.

Comment: Any reduction in visitor facilities would undoubtedly lead to additional camping in unmanaged locations. Invariably, the risk of wildfire, disturbance to plants and animals, and pollution/littering problems would all increase. Park employees should refrain or at least use greater discretion before directing park visitors to primitive camping locations outside of the park when park facilities are filled to capacity.

Response: As shown on pages 67 and 68 of the *Draft General Management Plan*, the preferred alternative calls for protecting park resources while improving visitor facilities. Campgrounds (and trails and related facilities) would be retained and kept at approximately their current levels.

The *General Management Plan* includes working with area tribes, partners, and local communities to

establish facilities, including campgrounds, outside the park boundaries (page 41, and alternatives). This will aid in reducing impacts in unmanaged, primitive camp areas.

Comment: In reference to the Forest Information Station in Forks, on page 333, we are uncertain what is meant by "minimal interpretation and opportunities for visitors to learn about park and forest resources, and help with safe trip-planning." We are certain that this reference to the Forks facility does not imply that the park staff there is providing "minimal" information. This is one of the few places outside park headquarters where a wide variety of services and information can be obtained with relative ease from some of the best informed, highly motivated, and easy to approach park staff in Olympic National Park.

Response: "Minimal interpretation and education opportunities" refers to the variety and frequency of interpretive programs, rather than the quality of those services. The Forks Information Center offers information and orientation services as stated on page 147 of the *Draft General Management Plan*. Visitors will continue to receive park and forest information, obtain both National Park Service and U.S. Forest Service permits, and purchase education materials through the cooperating association. This level of service is minimal when compared to other park areas, such as the Hoh Visitor Center, where more interpretive and educational services are offered.

Comment: Keep Sol Duc Hot Springs open.

Response: Under the NPS preferred alternative (page M20, number 1) the existing Sol Duc Hot Springs Resort will be retained and opened on a seasonal basis (similar to how it currently operates). The season of use could be adjusted.

Comment: The proposed expansion of campgrounds will affect the amount of noise pollution that is emitted into the surrounding area.

Response: Under the preferred alternative, there will be no large expansion of campgrounds within the park. There may be slight increases in sites or redesign/relocation of campsites or campgrounds at Sol Duc and Ozette; in other areas, campgrounds will be retained as feasible (such as at the Hoh, Kalaloch, and South Beach). The impacts to soundscapes from existing park facilities are

evaluated in the cumulative effects analysis on pages 201-202, 237, 276, 312.

Comment: I can not believe you would consider closing the Kalaloch Campground since it is probably the most popular campground in the whole park.

Under the NPS preferred alternative (page M36, number 5.) campground facilities will be retained at Kalaloch, although they could be moved outside the active coastal erosion zone.

Comment: Additional camping is needed at Lake Ozette.

Response: Under the preferred alternative (page M24), additional camping will be explored in areas outside the park, including Ozette. Through the wilderness management plan process, Olympic National Park will consider additional areas that may be suitable for designation of camping on the lakeshore. Camping could also be addressed during future planning processes within the boundary expansion areas, if these areas are authorized and acquired through the willing seller process.

FISHERIES

See also Boundary Adjustments

Comment: We request a citation that states clear evidence of a decline in bull trout populations within specific areas of Olympic National Park; specifically in western Olympic peninsula coastal streams and rivers. The Hoh Tribe is unaware of any indication that bull trout populations have declined in the Hoh River and other Olympic Peninsula rivers.

Response: The language in *the General Management Plan* (page 114) applies to the Coastal-Puget Sound population of bull trout on the Olympic Peninsula as a whole, and not necessarily to the coastal rivers specifically.

There is evidence from the North Fork Skokomish River (Olympic National Park Files, 1975-2006) and the Elwha River (Olympic National Park files) that indicates that bull trout exist in low abundance in those systems. The abundance of bull trout in the Elwha River below Elwha Dam is particularly low.

There is no published information on trends of bull trout from coastal rivers although direct and

indirect mortality of bull trout occurs in commercial and recreational fisheries. The extent of influence of fisheries-related mortality on bull trout is unknown due to a lack of information on stock abundance or catches (Brenkman et al. 2007b).

Comment: The Hoh is the only major stream without hatchery influence. I suggest a creative alternative that treats the fish that live in the Hoh at least equal in importance with visitors.

Response: The commenter is correct in noting that the Hoh River is one of the few major streams along the coast without major hatchery influence. However, hatchery-originating winter steelhead are released into the river and hatchery-originating Coho and hatchery-originating summer steelhead have been observed in the Hoh River basin within the park. (Olympic National Park files).

Alternative B (Resource Protection Emphasis) for the Hoh area (page M30) would allow the natural meandering of the river to take precedence over visitor access.

The preferred alternative in the *Draft General Management Plan* is designed to meet desired conditions for rivers and floodplains (page 19) and minimize adverse effects on natural river processes. In the Hoh, the preferred alternative (page M32) combines the use of protective measures that minimize effects on aquatic resources with future studies to evaluate road relocation to areas outside the floodplain, with wilderness boundary adjustments, if feasible.

Comment: On page 110 the statement “Introduced hatchery stock, overfishing, and degraded habitat have resulted in the destruction of wild, native strains of fish and have altered aquatic systems” is a generic statement that is not truly applicable to all Olympic National Park stocks of salmonid fishes.

Response: The commenter is correct. This statement is meant to be a generic statement about fisheries resources. More specific information is provided for special status fish, including specific threats and current status, starting on page 114 of the *Draft General Management Plan*.

Comment: The tribe co-manages the fisheries and associated habitat with the Washington Department of Fish and Wildlife, (WDFW) within our “usual and accustomed” area as defined by the 1855 Treaty of Point No Point, later affirmed in US v

Washington, and referred as the Boldt Decisions. The co-managers determined a Skokomish Salmon Recovery Plan is to be developed this year, with an emphasis on the ESA-listed stocks, including Puget Sound Chinook, Hood Canal summer chum, and coastal bull trout, but addressing all salmonids. Coastal steelhead are also proposed for listing. This product is in development and can benefit from fruitful dialogue with NPS staff. Landlocked salmonids in Lake Cushman and park waters do not have the access opportunities to pursue the anadromous characteristics associated with life history behaviors.

Response: The Park Service is very interested in the recovery plan and would be willing to work with the tribe on these issues.

Fisheries — Cumulative Effects

Comment: On page 315 the plan states: “Cumulative effects [of all projected future actions in conjunction with alternative D] would be minor, long-term, adverse and beneficial.” This statement is a non-sequitur; the fact that the Elwha dam removal would be beneficial doesn’t obviate the fact that a lot of damage will be done over time to the other river systems in the park (described in the *General Management Plan* as moderately adverse), threatening their salmonid population units. How can one add these together and conclude only a minor adverse impact?

Response: The analysis of cumulative effects addresses the overall impact of the alternative when combined with the effects of other actions. Pages 177-178 of the *Draft General Management Plan* provide more information about cumulative impacts.

Comment: Page 322 of the plan states: “[Alternative D’s] contribution to [moderate to major adverse impacts] would be small.” However, earlier on the same page it states that “habitat in the park could become some of the only remaining quality habitat on the peninsula.” If alternative D would have possibly major adverse impacts within the park and the park might have the only good habitat left, a conclusion that alternative D’s impact would be small seems like a complete abdication of the primary purpose of the national park system.

Response: The State of Washington’s Forest Practice Regulations that implement the “Forests

and Fish” Legislation, and Department of Natural Resources’ Habitat Conservation Plan are intended to improve water quality and fisheries habitat on the Olympic Peninsula. However, habitat in the park could still become some of the last remaining quality habitat on the Olympic Peninsula, as stated on page 322.

The overall effect of alternative D to special status species will be beneficial, and the alternative’s contribution to the cumulative effects, as stated on page 320 of the *Draft General Management Plan*, will be small, for the following reasons. Alternative D will

- not remove a large portion of terrestrial habitat (except for potential road relocations)
- keep developed areas at about the same levels
- relocate portions of park roads away from fisheries habitat
- allow for protection and restoration of rivers and floodplains
- continue protection of 95% of the park as wilderness
- expand park boundaries to encompass and allow for restoration of old growth habitat

Fisheries — Exotic Species

Comment: More attention needs to be given to exotic fish and their impact to native species.

Response: The desired conditions section of the *Draft General Management Plan* includes prohibitions on stocking of exotic fish species (page 23), and page 24 describes the park’s desired conditions and strategies regarding exotic species. More detailed planning will occur in the future to address exotic fish in the park.

GENERAL MANAGEMENT PLAN, PURPOSE AND NEED

Comment: We question the authority of the National Park Service to implement changes without documenting reasons for the changes.

Response: The *Draft General Management Plan* provides information and background on proposed changes in the park. Under *NPS Management Policies 2006*, general management plans are

required for each unit of the national park system (2.3.1).

The purpose of the general management plan is to establish and articulate a vision for the future of the park (page 3) and provide guidance for the next 15 to 20 years. Decisions made through the general management plan process take into consideration the legal mandates that the Park Service must fulfill (National Park Service Organic Act, Olympic National Park’s enabling legislation, purpose and significance of park); changing conditions in the park and region; and public, agency, and tribal input.

Implementation plans are required before many of the actions proposed in the *Draft General Management Plan* can be carried out. These plans will include additional opportunities for public review and input.

Comment: The *General Management Plan* is in many respects too “general” to be useful. Without more detail it is questionable whether alternative D can be effectively implemented as a policy document. Greater specificity in objectives and more detail in tasks will ensure that the alternative will be followed in the long-term, rather than left open to interpretation of future park managers. My recommendation is to add specific goals, objectives and related tasks, including details of budgetary requirements. This has been done in other national park general management plans. Include numbers of new campsites and improvements at identified locations, maximum sizes for interpretive centers, and limiting language which will ensure that no greater development is permitted than what is included in the agreed plan.

Response: As specified in the *National Park Service Management Policies 2006* (2.3.1) and park planning program standards, and as stated on pages 4-5 of the draft plan, general management plans must focus on parkwide management concepts, resource conditions, and opportunities for visitor experiences. Further, they must allow for management flexibility over time to adjust activities to reflect new information and changing circumstances.

General management plans do not include implementation level planning, but include those desired conditions and the changes that need to be made to move from existing to desired conditions.

General management plans do not delve into the type of detailed information requested by the commenter, but follow-up implementation plans (as listed on page 151 of the final plan), developed after completion of the *Final General Management Plan*, will include this information.

Comment: No ecosystem study was completed to inform longer-term decisions.

Response: We are uncertain what the commenter means by “ecosystem study.” Olympic National Park is large enough, and funding too limited to allow comprehensive, on-the-ground research in every area of the park. However, park biologists maintain data sets related to a variety of short-term studies, as well as limited longer-term monitoring programs on selected resources (for example, northern spotted owl, Roosevelt elk, intertidal communities, etc.). All of this information is used in management planning and decisions.

Comment: I see no mention of performance audits in this document.

Response: Performance audits are outside the scope of a general management plan.

Performance measures are included in the park's five year strategic plan. The strategic plan is developed in the Performance Management Data System which was a result of the Government Performance and Results Act. Periodic performance audits, as well as financial audits will be conducted as routine management controls of any specific program or project which may be developed within the context of the general management plan.

Comment: Ban hunting and trapping in the park; ban new roads; ban snowmobiles, jet skis; ban prescribed burning and logging.

I did not find [reference to the following]: mountain goats, grizzly bears, snow mobiles, off-road vehicles, internal combustion engines, helicopters, horses, llamas, dogs, rats. If they are addressed, please tell me where. If not, why not?

Response: Hunting, trapping, “jet skis” (personal water craft, PWC), off-road vehicles, and logging are not permitted in Olympic National Park. These activities are all regulated in 36 CFR Part 2 and Part 3. Snowmobiles are also regulated in 36 CFR 7.28 and are permitted on a limited number of specifically designated roads within the park.

Prescribed burning is directed by the park's fire management plan which was enacted in 2006 after an extensive review process.

The National Park Service has no intention of creating any new roads within the park, but we are proposing to keep and maintain all existing roads open to vehicular traffic.

Several of the other topics mentioned by the commenter are addressed in the plan, but may be grouped within a broader topic. Mountain goats and some rats are not native to the Olympic Peninsula; see information in the plan about management of non-native wildlife (page 111 of the *Draft General Management Plan*). Similarly, internal combustion engines may be covered within the discussion of vehicles, while the sections of the plan that address stock use contain information related to llamas and horses, both of which are used as stock animals in the park. Some of these items are implementation level concerns, not addressed in the *Draft General Management Plan*. Grizzly bears have never occurred within Olympic National Park.

GEOLOGIC PROCESSES

Geologic Processes — Cumulative Effects

Comment: On page 202 of the plan, the plan states: “Cumulative effects to geologic processes within and outside the park are moderate, long-term, and adverse. Implementing the no-action alternative would not add to these effects, and no impairment of geologic resources would occur.” The no-action alternative would indeed add to these effects, because of the cumulative impacts of existing and future bank-hardening projects.

Response: Cumulative effects to rivers and floodplains are not addressed in the geologic resources section, but are addressed in the hydrologic processes section of the environmental consequences (pages 202, 239, 278, and 314).

The no-action alternative is used as a baseline for evaluating the other action alternatives. Current conditions were considered in the analysis.

MANAGEMENT ZONING

See also, Wilderness

Comment: Discuss reasoning behind selection of development zones — some in alternative D are larger than alternative C.

No justification for increased development is offered in the draft, nor is any indication given of the types of development. No acreages for the development zones are provided. A simple table comparing acreages for these zones for the various alternatives would be very helpful.

Response: The alternatives provide a range of management options and were developed through public input and park staff review. The frontcountry development zones are all within nonwilderness portions of the park, thus the overall acreage within these zones has not increased from current conditions. However, within the zones, options are included for each area to provide future management direction if, for example, site conditions change and facilities need to be relocated or constructed.

Area-specific proposals and changes were shown on the alternatives maps within the *Draft General Management Plan*. There will be no overall increase in frontcountry zones under the preferred alternative, though the low use zone on the north side of Lake Crescent may become “wilderness” if a suitability determination followed by a wilderness designation occurs (page M16). Therefore, under the preferred alternative, there could be a slight increase in wilderness zones and a slight reduction in frontcountry zones.

The maps provide a general area of zoning; on the ground surveys have not occurred and specific acreages are not available at this time.

Comment: Should campgrounds or expanded visitor facilities be constructed just for a one- to two-month high-use season (July–August) in certain resource management areas? Clarify the number of campsites in the developed zones for each alternative.

It is inappropriate to expand the number of campsites at Sol Duc from 82 to 250 sites.

Response: The National Park Service has no intention, under any alternative, to expand the number of campsites to 250 sites in the

development zone, including at Sol Duc. We have clarified this in the final plan on table 2 of the final plan and on the alternative maps.

The current number of campsites in any campground may be expanded or decreased slightly for resource or visitor protection. Facilities that do not meet current visitor and park needs, such as the Hoh Visitor Center and the Kalaloch Information Center, will be expanded under the preferred alternative. These expansions will address year round visitation needs.

Comment: We believe that there should be some recognition of the Queets campground and boat ramp as “day use” within the *General Management Plan* to reflect how, in fact, that area is utilized.

Response: The *General Management Plan* reflects the utilization of the Queets campground and boat ramp as “low use” based on the definitions provided in table 2, page 69 of the final plan. The road corridor also falls within the description of a low use zone. The campground can not fall within “day use” as that zone does not include overnight camping.

Comment: The no-action alternative should include those steps the Olympic National Park would be expected to take to bring it into compliance with the National Park Service management zoning standards.

Response: The primary purpose of the no-action alternative (page 63) is to provide a baseline for comparing the environmental consequences of the other alternatives and is a realistic representation of the continuation of existing park management. Since zoning does not exist under the current park management direction, a continuation of this direction would not include zoning. Without implementation of the general management plan, there would be no zoning designated within the park.

Comment: The Hoh Rain Forest, in and around the visitor center, should be designated as an acoustic conservation zone. But failing that, there needs to be special management of this area.

Designate natural soundscape management units using watersheds as the boundaries.

Response: Although the *General Management Plan* does not prescribe specific “acoustic conservation zones” in the park, the plan (page 14) does establish

desired conditions and strategies to protect soundscapes within the park. The activities of park management, concessioners, and visitors in all zones will be managed to minimize or mitigate noises produced by equipment. Additionally, because the majority of the park is designated wilderness, there is protection for natural quiet, and opportunities for experiencing natural sounds.

Comment: We believe efforts should be made by the National Park Service to designate the western terminus of the Oil City Road, and the trailhead, as either low use or day use. If Congressional approval to do so would be required, we would be supportive of efforts by National Park Service to seek such approval. This area is currently being used in that capacity and the *General Management Plan* should recognize this fact. We also believe that the roadway and area in and about the "Big Cedar Tree" should be designated day use.

Response: The Oil City road/trail corridor (from the park boundary to the wilderness boundary) is zoned low use in all alternatives. The Big Cedar access road is zoned day use in alternative A, and low use in alternatives B, C, and D. The day use zone was generally reserved for high use areas with paved roads.

Comment: Within the frontcountry, include as much land as possible in the low use zone as opposed to day use zone, especially in the river valleys such as the Quinault River between the lake and bridge. These areas are the least apt to suffer damage from use as they are sand and gravel bars exposed after annual flooding. These are the best areas for family camping.

Response: Frontcountry camping can occur only in designated campsites, as stated in 36 CFR 2.10 (a): "The Superintendent may require permits, designated sites or areas, and establish conditions for camping." The Quinault River between the lake and bridge is within the frontcountry. This area is not currently designated as an approved camping area in the Superintendent's Compendium. The Compendium does allow for camping on river bars within the backcountry, provided they are more than a mile from the nearest trailhead.

River Zones

Comment: Reconsider adding river zone at least for the Queets and Quinault rivers.

Response: This alternative was considered but not included as part of the preferred alternative. Under the preferred alternative, the National Park Service will strive to relocate park roads or at-risk portions of roads away from rivers. In addition, as wild and scenic river eligibility studies are completed and rivers are designated as wild and scenic rivers, this would afford a level of protection similar to that of the river zone.

Intertidal Zones

Comment: Intertidal reserves can produce economic benefits by preventing fish population crashes that force broad closures.

Response: In some cases it has been shown that marine protected areas can produce economic benefits by buffering fish populations from crashes. However, the intertidal reserves under consideration in this plan are targeted towards benthic invertebrates and seaweeds, and fishing will still be allowed. Due to the rugged nature of the coastline in the areas under consideration, little fishing is done from shore, and little growth of this type of harvest is anticipated in the future. The larger threats to intertidal resources are related to harvest of benthic invertebrates and seaweeds. Therefore, intertidal reserves are not expected to alter marine fish populations, except through the possibility of providing richer foraging grounds as discussed in the "Environmental Consequences" section on pages 240, 278, and 315.

Comment: The state still has a responsibility in the management of the coastline of Olympic National Park. The testimony and congressional record for establishment of the park's coastal area made it clear that the park has a role in coastal intertidal zones but that enjoyment and use of this area would not be hindered by such park management policies as "No-Take" zones. The National Park Service has not shown direct cause; an impact to resources has to be quantified.

Response: Olympic National Park has exclusive federal jurisdiction over the park intertidal zone, including management of non-tribal natural resources. When the intertidal zone was transferred from state jurisdiction to the National Park Service in 1986, three covenants were attached to the transfer (July 28, 1988 Governor's Deed from Washington State Parks and Recreation Commission to the United States conveying the

State’s Right, Title, and Interest to the Tide Lands in Jefferson and Clallam Counties). These covenants state that

- 1) the intertidal zone shall be open to the taking of fish and shellfish in conformity with the rules and regulations of the State of Washington,
- 2) the National Park Service shall consult with the Washington State Parks and Recreation Commission prior to the implementation of any regulation of recreational use of the property, and
- 3) The National Park Service shall consult with the Washington State Parks and Recreation Commission regarding the adoption of any rules or changes in management policies with respect to the property and shall endeavor to accommodate the state's interest.

These covenants are not in conflict with the National Park Service exclusive jurisdiction or with the potential National Park Service decision to institute intertidal reserves. The State of Washington will continue to be consulted after the *Final General Management Plan* is approved and throughout its implementation. This information has been clarified in the *Final General Management Plan* in Chapter 1, “Regional Context” and “Laws, Regulations, and Servicewide Mandates and Policies,” and in Chapter 5, “Consultation and Coordination.”

As stated on page 72, intertidal reserve zones are proposed to protect areas of high biodiversity and productivity, allowing organisms to reproduce and populate adjacent areas. In recommending these sites, we used data on habitat characteristics, community diversity, and information derived from the Marine Conservation Working Group of the Olympic Coast National Marine Sanctuary Advisory Council.

As noted in the report of the Marine Conservation Working Group (December, 2003), impacts to intertidal areas of Puget Sound “became apparent more than a decade ago, when biologists noted some beaches were denuded of almost all edible marine organisms.” Although not as severe or widespread, similar impacts from trampling and harvest of intertidal organisms are occurring along the Olympic coastline.

As visitation increases on the coastal portion of the park, the National Park Service anticipates additional impacts to intertidal organisms and habitats. National Park Service *Management Policies 2006* (4.1) directs park managers to proactively

protect park resources to prevent degradation. Establishment of intertidal reserves is consistent with goals of Executive Order 13158 (May, 2000), “Marine Protected Areas,” which include enhancing ecological and economical sustainability of coastal areas for future generations.

Comment: There are a number of areas in the *Draft General Management Plan/EIS*, where additional references to the marine areas adjacent to Olympic National Park may be mentioned. For instance the “Regional Context” of the *Draft General Management Plan* references the management of adjacent terrestrial areas, but does not mention the management of adjacent marine areas. There are a number of “Parkwide Policies and Desired Conditions” (including associated strategies) that could also be expanded to include supporting the Olympic Coast National Marine Sanctuary’s overflight restrictions as a strategy. Additional policies explicitly include marine areas. For instance the “Natural Soundscapes” section could be expanded to be more specific to the park's coastal strip and adjacent marine areas.

Response: We have included information about the marine areas adjacent to the park in the final plan on pages 12-13, 26, 51, and appendix C. In addition, we have updated text on page 4, under “Regional Context” to include information about the Olympic Coast National Marine Sanctuary and the U.S. Fish and Wildlife Service Maritlim National Wildlife Refuge Complex and overlapping boundaries /jurisdiction.

Comment: On Table 1, page 57 we recommend changing the language to avoid confusion. There should be consistent use of the term “intertidal areas” where appropriate and exclusive use of the term “zone” in the phrase “intertidal reserve zones.” Part of the confusion results from common use of the phrase “intertidal zone” by ecologists/biologists. In the *Draft General Management Plan/EIS*, the intertidal reserve zone is a zone type with several areas of designation. However, a casual review of Table 1 might lead a reader to think this zone type is recommended for all intertidal areas in the park.

Response: We have clarified this in the final plan.

NIGHT SKY

Comment: The outdoor lights on the bathrooms in some park campgrounds are creating adverse impacts to the night sky.

Response: Page 15 of the *Draft General Management Plan* establishes the desired conditions and strategies for “Lightscape Management/Night Sky.” In developed areas, artificial outdoor lighting will be limited to basic safety requirements and will be designed to minimize impacts on night sky.

OLYMPIC HOT SPRINGS

Comment: Olympic Hot Springs do not damage the environment. Visitors are not building new pools or enlarging the existing pools. Leave it the way it is.

Response: Olympic Hot Springs in their natural configuration (as natural seeps) do not damage the environment. However, visitors to the springs frequently construct, enlarge, and maintain impoundments to create bathing pools. These impoundments affect natural flow of the water and create ideal incubation pools for bacteria. In addition, materials such as carpet and plastic sheeting are brought in and left in the pools. According to area rangers, hundreds of pounds of debris are removed every year from the area.

Under “Parkwide Policies and Desired Conditions — Water Resources” (page 18), goals for the protection of surface and groundwater are established, and include pollution prevention and protection of aquatic organisms. Restoring Olympic Hot Springs will allow the park to meet these desired conditions.

In addition to environmental impacts, the Olympic Hot Springs pools attract undesirable activities and crimes, making them an area of concern when compared to other places in the park.

Comment: Who has determined what a natural state is at Olympic Hot Springs?

Response: The National Park Service will work with the Lower Elwha Klallam Tribe, water resources specialist, and hydrologists to develop an implementation plan for restoring Olympic Hot Springs. This information has been clarified in the *Final General Management Plan* under “Future Studies and Implementation Plans.” We will also involve interested public during this process. Through this process we will determine the natural state of the springs and restoration goals for the area.

Comment: The trail to Olympic Hot Springs is one of the few areas accessible by bicycle.

Response: The commenter is incorrect. Bicycles are not allowed on the Boulder Creek Trail.

As stated on page 162 of the *Draft General Management Plan*, bicycles are permitted on park roadways and are prohibited in the wilderness and on trails, with the exception of the 4-mile-long Spruce Railroad Trail, which will eventually be linked to a regional multi-purpose trail to improve access.

Comment: The Olympic Hot Springs resort has been allowed to deteriorate or disappear altogether under National Park Service management; it is shameful.

Response: Olympic Hot Springs opened to the public in 1909. The hot springs buildings and operation closed in 1966. The site remained officially vacant for the next six years, although in reality, squatters took up residence in the buildings. In the late 1960s or early 1970s, heavy snow caused the collapse of a number of the buildings. As a result, in 1972, the National Park Service demolished the remaining buildings after they were evaluated for historical significance. Today, remnant earthworks of building foundations and pools along the steep hillside are the only remaining features of the resort development. Yet, as occurred during the pre-development days, visitors have dammed springs and excavated pools in order to build tubs.

Comment: Olympic Hot Springs is the last functioning and accessible natural hot spring on public lands in Washington.

Response: The Olympic Hot Springs is one of five functioning and accessible undeveloped hot springs in Washington. Four of these are on public lands.

OZETTE LAKE

Motorized Use

Comment: Lake Ozette has had motorized use since the early 1800s.

Response: European settlement of the Ozette did not start until around 1890. We do not know when

the first motorized boat was used on the lake, but it was probably after 1890.

Comments: Motorized use of Lake Ozette is a tradition that has been going on for 50 plus years and should continue to be permitted.

Section 5 of the enabling legislation includes full use and enjoyment of the land, which includes the entire lake to motorized boating.

Access on Lake Ozette is important for emergency and safety responses.

The intent of section 332 of HR 13713 was not to limit or eliminate the use of motors on Lake Ozette. Section 332 of HR 13713 says, “Present public access as well as private owners, as well as visitors to the park who may wish to boat” (DAV#460338429135 Chapter A One #33)

The 1976 legislation made it clear that public access will be maintained, including Rayonier Landing, which has been shown to be in full use prior to that legislation

Ingress and egress rights of landowners prior to 1976 are still in place through the following points/methods: Motor boats from three launch sites; Hoko Ozette Road and Swan Bay Road; Network of logging roads

Response: The final plan has been revised on page 107 of the final plan to clearly state that any current private property owner having land adjoining the lakeshore will be provided continued boat access to their property. Private property owners within the proposed boundary adjustment area will continue to have access to the lake at the Swan Bay launch site via public road. In the proposed boundary adjustment, the opportunity exists to retain or establish road access based on the conveyance of an access easement from the current land owner. Until the National Park Service acquires the underlying private land, it remains the matter of the two landowners to provide legal arrangements for easement rights. The National Park Service will honor any existing documented access rights.

It is logical to conclude that traditional use of the three boat launches at Ozette (Swan Bay, Rayonier and Ranger Station) included launching of motorized boats for both recreational use on the lake and for accessing private properties. Any limitations or restrictions regarding use of boats

with motors will be developed with the participation of the private property owners at Lake Ozette as part of the process to develop a “Lake Ozette Management Plan.” This plan has been added to page 151 of the final plan under “Future Studies and Implementation Plans Needed.”

Comment: The plan speculates there may be a need to zone or restrict (Lake Ozette) motorized boating for the purpose of resource protection, yet it fails to identify why specific resources are in jeopardy.

Response: Two alternatives in the *Draft General Management Plan* analyzed potential restriction or zoning of motorized boating on Ozette Lake. Both alternative C (page M23) and alternative D (page M24) considered this option and it is included in the final preferred alternative D. The purpose is not to protect particular resources that are “in jeopardy” on the lake. Instead, zoning will give park managers a way to help ensure that both motorized and non-motorized users will continue to have suitable areas to recreate without conflict. This language has been clarified in the plan on page 107 of the final plan.

Comment: Rayonier Timber Company donated the land at Rayonier Landing for local citizen use. The Draft General Management Plan reverses the intentions for which this land had been given.

Response: Rayonier Timber Company did not donate the land to the federal government. The land was purchased from them at a cost of \$2,062,000. In that purchase, there were no stipulations in the land transfer of specific land use or rights to the public access. However, the following was found under Congressional Record — Senate S 17735, October 1, 1976. Senator Jackson clarified two points pertaining to section 322 of HR 13713 (Public law 94-5780) the enabling legislation for the addition of Ozette.

“First, several land owners along the east side of Lake Ozette have expressed concern as to what future rights they will have on their property under the provisions of this bill. I want to make it clear that if an owner consents to acquisition of a scenic easement, this will not preclude him from constructing a recreational residence or cabin similar to the ones scattered along the lake shore. The primary reason for the acquisition of a scenic easement is to preclude commercial development along the beautiful lake not to restrict reasonable use of land belonging to private citizens.”

“I think it should also be pointed out, Mr. President, that it is expected that the present access sites available around the lake will be maintained by the National Park Service in a way that will allow use by private land owners as well as visitors to the park who may wish to boat in this outstanding scenic area. I ask unanimous consent to print in the Record the House amendments to H.R. 13713.”

Based on further analysis, we have modified the preferred alternative (page 107 in the final plan) to keep Rayonier Landing open to day use.

Comment: Supposedly motorboats are limited to the central area of Lake Ozette which accesses Erickson Bay; however, this rule is not enforced.

Response: Motorboats are currently permitted throughout Lake Ozette. The only restriction concerning boat operations is “Vessels may not create a wake or exceed 5 mph on Lake Ozette within 100 yards of shore near the ranger station and campground as marked with signed buoys and within 50 yards of the shoreline.” This regulation can be found in the Superintendent’s Compendium under 36 CFR 3.6 Boating Operations.

PARTNERSHIPS

Comment: The National Park Service should pursue more partnerships to provide services such as trail clearing and reclamation, and campground maintenance.

It is interesting that there is no specific item that ensures that the Park Service work better with local governments to create such partnerships. The issues associated with the "Tribal Relations" element could equally be raised and reviewed for gateway communities and county.

Response: Partnerships were addressed on page 41 of the *Draft General Management Plan*. This information has been updated to clarify the intent to establish partnerships with concessioners, local and regional communities, groups, tribes, and others.

Partnerships were also addressed on page 33 under “Visitor Use and Experience, Education, and Outreach” (Strategies) along with the strategies for “Rare, Threatened, and Endangered Species” (page 25), “Exotic Species” (24), “Native Species” (Page 23), “Marine Resources” (page 21) “Water

Resources” (page 18), “Fire Management” (Page 17), realizing that these lists are not all inclusive and strategies will be further developed in the future.

PRIVATE LANDS

Comment: What are the park’s management plans for the Oil City inholdings? Are these going to be acquired by the park?

Response: The policy of the National Park Service is to purchase lands from willing sellers only. As opportunities for purchase are presented and adequate funding is available, the National Park Service will be responsive to these requests.

Comment: The plan doesn't address privately owned lands within the park boundaries.

The included maps fail to depict the thousands of acres of private property including working ranches, many dozens of active home sites, and other holdings adjacent to the park.

Response: The approximately 600 acres of private lands currently within park boundaries are not included in the *Draft General Management Plan* as they are considered in the current land protection plan.

The policy of the National Park Service is to purchase lands from willing sellers only. As opportunities to purchase are presented and adequate funding is available, the National Park Service will be responsive to these requests.

We have added a footnote to the maps that private property is not shown on the map due to the scale of the map.

Comment: Private timber land purchases mentioned for boundary line adjustments are stated to be between willing buyer and willing seller, as noted on pages 34, 35, and 369. Purchases of other lands within Olympic National Park are not clearly stated to be between willing buyer and willing seller.

Property inholders within Olympic National Park are not mentioned in the *General Management Plan* except to state some properties are not consistent with park goals. The conclusion on page 211 states "some nonhistoric structures may be removed." Does this mean inholders are planned to be excluded? Will the willing buyer-willing seller plan currently in use for acquiring inholder properties be

part of the general management plan? This part of the plan should be modified to clearly include inholders as part of the willing buyer willing seller policy.

Response: The *Final General Management Plan* has been updated on page 48, under “Relationship of Other Planning Efforts to this General Management Plan.”

All private lands within the park are subject to the existing Land Protection Plan (1983) that is used to evaluate areas of resource concerns. Any potential acquisitions identified through the Land Protection Plan will be made only from willing sellers. As opportunities to purchase are presented and adequate funding is available, the National Park Service will be responsive to these requests.

This text has been clarified on pages 41 to 47 and appendix B of the final plan.

Comment: Acquiring private property at Quinault has caused a hardship for the Quinault area. We are losing revenue from taxes which is putting our public schools and services at risk.

Response: The Park Service only acquires private property from willing sellers. Many of the properties currently coming to the National Park Service were actually bought some years ago and the 20 and 25-year “Use and Occupancy Agreements” are now expiring.

Payments in lieu of taxes (PILT payments) are paid to the states to offset the loss in tax revenue that would have been collected if the properties had stayed in private hands. In 2006, that payment to the state of Washington was projected to be \$6,592,856 statewide. The state then has the responsibility of distributing this revenue to local communities.

RECREATION

Comment: Please make sure the plan specifically states that whitewater kayaking is an approved activity for all time.

Response: This plan establishes the park management direction for the next 15 to 20 years. Within that time frame, as stated on pages 58 and 59 in Table 1 of the draft plan, within the frontcountry and wilderness zones, nonmotorized /hand powered boating,

including kayaking, will continue to be an approved activity.

REFERENCES

Comment: The long list of references doesn't mention contacts with local Chambers of Commerce and Economic Development Councils that could have provided current visitor and economic data or the affected landowners. The website for Clallam County Economic Development Council contains two documents of current economic data, 2005 Community Profile and 2005 Labor Market Analysis from 1997 to 2004. The University of Washington School of Forestry and Peninsula College could have provided assistance on the forest conditions and economic data on the region and current economic data which is outdated or missing in your draft plan.

Response: These references have been reviewed and considered in the *Final General Management Plan / Environmental Impact Statement*. New information has been added to the *Final General Management Plan* based on the available information at the time of publication.

RIVERS AND FLOODPLAINS

Comment: We object to the draft's decision to continue the annual bulldozing at Finley Creek channel.

Response: The future of Finley Creek will be addressed in a North Shore Road/Finley Creek development concept plan, as noted on page 81 of the *Draft General Management Plan*. This plan will be developed in collaboration with the Quinault Indian Nation, federal and state land management and permitting agencies, water resources experts, and area landowners and will address the hydrologic and geomorphic issues associated with maintaining year-round vehicle access in this unstable environment, with a goal of returning Finley Creek to a more naturally functioning and stable condition.

Comment: Alternative D fails to maintain, protect, and restore the most basic natural processes that support healthy forested river valley ecosystems and critical habitat for fish and wildlife. It conflicts with many of the park's own desired conditions that

were identified in the *Draft General Management Plan*.

The strategy under “Rivers and Floodplains” on page 19 of identifying “park or visitor facilities located within” 100-year and 500-year floodplains is a prudent risk management objective. However, the strategy does not clearly identify what exactly National Park Service will do with such knowledge. In addition, later discussion of facilities at Mora, Hoh, and other such areas that would be retained unless “lost to a catastrophic event” appears to indicate a desire by the National Park Service to identify potential at-risk sites, but to do little to plan for replacement, movement, or improvement of such facilities to reduce such catastrophic losses.

The plan makes no commitment to altering the current status regarding road placement, maintenance, or protection in the Quinault floodplain. In addition, the plan does not mention the National Park Service bridge across the Quinault River, a structure that causes major impairment to hydrologic processes on the floodplain.

The plan should include government-to-government consultation with the Nation prior to moving roads in the Quinault area in the event that the NPS determines that roads need to be moved.

There is enough flexibility in the plan to allow poor practices (in terms of protection of floodplains).

Response: It is true that the details of proposals (e.g. specific sites or roads that would be moved to prevent catastrophic loss) are not included in the general management plan. Rather, the general management plan provides the necessary foundation for identifying flood-prone areas and at-risk roads and facilities and then developing plans to protect or relocate them. Future planning will be needed to identify those specific areas most at risk and to determine proactive responses (“Future Studies and Implementation Plans Needed,” page 81.)

The purpose of general management plans is to establish and articulate a vision for the future of the park, including the management philosophy and the framework to be used for decision making and problem solving. This is in accordance with NPS *Management Policies 2006* (2.3.1), as shown on page 3 of the *Draft General Management Plan*. National Park Service Planning Program Standards (DO-2)

explains further that general management plans need to focus on parkwide management concepts, resource conditions, and opportunities for visitor experiences and must allow for management flexibility over time to adjust activities to reflect new information and changing circumstances. To summarize, general management plans should not include implementation level planning, but should include those desired conditions and changes that need to be made to move from the existing to the desired conditions.

The preferred alternative in the *Draft General Management Plan* includes desired conditions for rivers and floodplains (page 19) with a goal of minimizing adverse effects on natural river processes. The preferred alternative also addresses river protection by calling for the use of protective measures that minimize effects on aquatic resources (pages M12, M20, M48, and M52) and future studies to evaluate road relocations to areas outside the floodplain, with wilderness boundary adjustments, if feasible (pages M32, 40, and 44).

The Park Service would collaborate with area tribes during the development of road relocation studies and river reach analysis. If portions of roads are determined to be at risk, government-to-government consultations would be conducted with area tribes as part of developing a separate implementation plan for road relocation and river restoration.

Comments: The *Draft General Management Plan* would sanction continued bulldozing, road construction and rip rapping in riparian zones, with known deleterious effects on threatened fish habitat and huge costs for annual road restoration. In addition, this sort of riparian restoration eliminates the possibility of Wild and Scenic River status for a dozen Olympic rivers that would otherwise qualify.

Alternative D calls for ad hoc management of floodplains that resembles current management.

Desired conditions should be rewritten to ensure environmental protection within floodplains.

Increases in visitor use and road construction throughout the park over forthcoming years will exacerbate current hydrologic problems.

The Park Service has acknowledged that roads can be detrimental to ecological processes but does not plan any measures to reduce or eliminate those

detrimental effects. The general management plan should include actions to move the road systems outside of the floodplains. The plan should describe the use of a cooperative strategy with the state, counties, and tribes to accomplish this task, while protecting the treaty right interests of the nation.

Response: The *Draft General Management Plan* establishes parkwide policies for natural resources, including desired conditions for rivers and floodplains that call for using the most current engineering methods and techniques to minimize adverse effects on natural river processes while protecting park roads and facilities (page 19). One strategy will include an inventory of flood-prone areas near facilities and roads, and development of a program to minimize adverse effects on aquatic and riparian habitats and fluvial processes. One strategy, as identified in the preferred alternative, would be to move park roads, or portions of park roads for resource protection (page 68). The preferred alternative also addresses river protection by calling for future studies to evaluate road relocations to areas outside the floodplain, with wilderness boundary adjustments if feasible (pages M32, 40, 44), and the use of protective measures that minimize effects on aquatic resources (pages M12, M20, M48, M52).

The “Desired Conditions for Floodplains” (page 24 of the final plan) were modified to more explicitly describe National Park Service floodplain management policies to the public. The text has also been clarified on page 24 of the final plan, under Strategies:

- “Use current technologies over time to restore or improve floodplain and riparian functions altered in the past by bank-hardening techniques.”
- “If park facilities are damaged or destroyed by a hazardous or catastrophic natural event, thoroughly evaluate options for relocation or replacement by new construction at a different location. If a decision is made to relocate or replace a severely damaged or destroyed facility, it will be placed, if practicable, in an area believed to be free from natural hazards.” (NPS *Management Policies 2006*, 9.1.1.5)

Environmental Consequences — Rivers and Floodplains

Comment: On page 314 the plan states “Stream channels would continue to be minimally modified...” I object to the use of this adjective. “Impacts on hydrological systems from [Alternative D] would be long-term, minor to moderate, and adverse.” Using the definition of “moderate” given in the *General Management Plan*, I would claim that such a projected impact to irreplaceable natural resources would constitute a violation of the Organic Act. I would also object to a long-term projection of only “moderate” impacts.

On page 349 the plan states “There would be little potential for adverse impacts because there would be no major new development.” This statement is not true. The existing bank-armoring, plus the future bank-armoring that will be required by continued placement of park infrastructure in floodplains, has a huge potential for future adverse impacts.

On page 378, the plan states, “minor construction...” Many of the park’s bank-hardening projects were only “minor construction” at the time; these “minor” projects can add up to major impacts. “The proposed action would not have any additional adverse impacts on floodplains and their associated values.” Not true.

Response: The definitions of impact intensity (e.g. “minor,” “moderate,” and “major”) on page 187 were developed by park staff and resource experts from the National Park Service’s Denver Service Center and Washington, D.C. offices. As stated on page 272, there are unavoidable adverse impacts associated with existing conditions. We acknowledge that the location of park facilities and roads in floodplains, and the maintenance of these roads, has resulted in adverse impacts to floodplains. Under the preferred alternative, some of these roads and facilities will be removed from their current locations. Those that will remain will continue to cause adverse impacts.

Effects may be adverse and major but not constitute “impairment,” which would approach population or species loss, community dysfunction, or full system collapse and degradation. (See pages 183-184 for a full discussion of “impairment”.) Even so, the desired conditions for floodplains (page 19) include a strategy for protecting park facilities through the most current engineering methods and

techniques that minimize adverse effects on natural river processes. We have added the following strategy to the desired conditions, "Use current technologies, over time, to restore or improve floodplain and riparian functions altered in the past by bank-hardening techniques." Both conditions mitigate impacts to floodplain and riparian processes.

Upon further evaluation of the cumulative effects, based on additional information provided to us through the public review process, we have modified the cumulative effects analysis for hydrologic systems for alternatives C and D (pages 378 and 418 of the final plan).

Comment: Alternatives D & A are essentially the same when it comes to floodplain management, so describing alternative D's impact as "slight" and "small" is simply not true.

Response: The primary purpose of alternative A, the no-action alternative, is to serve as a baseline for comparing the effects of the action alternatives with the effects of continued implementation of the status quo. Alternative D, the preferred alternative, is different than the no-action alternative. Alternative D calls for more proactive measures to reduce impacts from park roads located within floodplains, including moving roads or portions of the roads outside active river channels (pages 68, M32, M40, M44), and using protective measures that minimize effects on aquatic resources (pages M12, M20, M48, M52).

Comment: It seems that the long-term effects of relocating the Hoh access road would be substantial to fish habitat and the river ecosystem would be very beneficial, not minor as stated in the plan.

Response: It is likely that removing the road for the stream meander zone will result in a "moderate" benefit to the fisheries and aquatic resources. This is reflected on pages 238 and 314 of the draft plan.

Cumulative Effects, Hydrologic Resources

Comment: On pages 203-204 the cumulative long-term impacts are described as moderate and adverse, but then because other moderate and adverse impacts are occurring outside the park, the conclusion is that there would be "no impairment of hydrologic resources." This is not true; even without the outside impacts, the long-term

cumulative impacts of bank-hardening activities within the park are significant and adverse, and the fact that outside impacts are occurring does not absolve the Park Service from acknowledging its own contribution to adverse impacts.

Response: The text on pages 203 and 204 of the *Draft General Management Plan* describe impacts from the no-action alternative. Adverse impacts are recognized there with the statement, "Implementation of the no-action alternative would perpetuate long-term moderate adverse impacts on hydrologic systems." However, even if an impact is determined to be adverse and major, that does not mean it impairs park resources in the way "impairment" is defined by the Organic Act and National Park Service *Management Policies 2006*.

Pages 183 and 184 provide a full discussion of "impairment," including the information that "An impact would be more likely to constitute an impairment to the extent it affects a resource or value whose conservation is necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or identified as a goal in the park's general management plan or other relevant National Park Service planning documents. Effects may be adverse and major yet not constitute "impairment," which would lead to population or species loss, community dysfunction, or full system collapse and degradation."

The desired conditions for floodplains (page 24) were modified in the final plan to more explicitly describe National Park Service floodplain management policies to the public. They include a strategy for protecting park facilities through the most current engineering methods and techniques that minimize adverse effects on natural river processes. We have added the following strategy to the desired conditions, "Use current technologies, over time, to restore or improve floodplain and riparian functions altered in the past by bank-hardening techniques." Both conditions mitigate impacts to floodplain and riparian processes.

Mitigation, Hydrologic Resources

Comment: In the "Mitigative Measures" section of the plan, there is a small sub-section of "Hydrologic Systems." Before reading this section, I assumed

that it would describe the importance of managing entire watersheds and recognizing the downstream effects of actions, especially actions that involve physical disruptions to the environment. Reading the actual notes in this sub-section, I felt that either I or the management planning team had misinterpreted “hydrological systems” and I looked for a section on “watersheds” or “watershed protection” in the mitigative measures, only to find no such section. To me, this is an omission.

Response: Mitigation measures describe the practicable and appropriate methods that will be used under any alternative to avoid and/or minimize harm to park resources. The general management plan includes measures that may be used to minimize potential impacts from the implementation of the alternatives. As implementation plans are developed, more site specific mitigative measures will be included.

Although these proposals do not encompass entire watersheds, alternatives B, C, and D each recommend that the park's boundary should be expanded to better protect park resources by acquiring portions of watersheds. Also, within the plan, the Park Service developed desired conditions and strategies to protect ecosystems (page 16) which include watershed protection.

SOCIOECONOMIC RESOURCES

Comments: National Park Service staff has attempted to explain that any detailed economic analysis of alternatives would be done after an alternative is chosen for adoption and a final *Environmental Impact Statement* is issued. However, that would appear to be different than the usual NEPA process where efforts are made to analyze reasonably expected impacts from the proposed action of the federal agency. As currently written, the draft does not provide sufficient information to allow officials to make a reasonable choice between alternatives. Without such information, it would appear that that *Environmental Impact Statement* and any decision thereon could be set aside by a court.

Alternative C would be demonstrated to be the preferred alternative if the full range of benefits [economic development] of Alternative C were analyzed correctly and completely.

Response: If the writer is referring to the environmentally preferred alternative: As stated on page 83, the environmentally preferred alternative is not based on cost or economic development, but on a number of criteria as established by section 101 of the National Environmental Policy Act including both resource preservation goals, sustainability goals, and visitor experience goals. As stated on page 63, the management preferred alternative was selected using a combination of factors, not limited to costs, but including the following: protecting natural and cultural resources; providing orientation and education, visitor access and recreational opportunities; protecting the health, safety, and welfare of the public and park employees; improving park operational efficiency and sustainability; and compatibility of the park's actions with its neighbors and the surrounding ecosystem.

Jobs

Comment: The draft's discussion of the area economy is seriously flawed. The forest industry is the regional industry and isn't even mentioned in this discussion; employment and manufacturing data provide no hint of the importance of the forest industry based economy.

Response: Tables 17 and 18 in the *Draft General Management Plan* (pages 168-169) included combined information on industries related to Agricultural Services, Forestry, and Fishing. The information has been updated in the *Final General Management Plan* starting on page 243 in the final plan to include data from the U.S. Bureau of Economic Analysis for 2005. (See Table 21: Earnings by Industry for 2005 and Table 22: Full-time and Part-time Employees by Major Industry for 2005 in the final plan.)

According to U.S. Bureau of Economic Analysis data for 2005, the county and regional economies are diversified and not as heavily dependent on the forest industry as may have been true historically. In 2005 forestry and logging, together with agriculture and forestry support services accounted for 4.8% of earnings in Clallam County and 1.3% in Jefferson County. Comparable earnings data were suppressed in Grays Harbor and Mason counties. However, available data suggest forestry and logging accounted for at least 4.2% and 2.5%, respectively, of total 2005 earnings in those two counties. The woods processing industries account for yet

additional earnings, particularly in Grays Harbor and Mason counties.

Comments: The jobs listed on pages 167-169 of the Plan indicate service jobs are the major type of job in Clallam County. According to the 2005 Clallam County Profile produced by United Way and Health and Human Services of Clallam County, the 2004 median household income in Clallam County was \$41,108 compared to the average of the State of Washington at \$51,762 per household. (See attached 2005 Profile stats) The western portion of our county struggles for every family wage earning job they can maintain. The potential loss of these 220 jobs would have a significant impact annually to Clallam County, and especially this western region of our county.

Jobs categories illustrated in Tables 17 and 18 grossly understate the true jobs impacts in both raw numbers of jobs as well as their annual earnings. We know from our own payroll sheets that many workers participating in the timber supply and logistics chain make annual salaries far in excess of the \$18,636/year shown in table 17.

The economic analysis is vague and incomplete (pages 162-174). There is no mention of the importance of the family wage jobs contributed by the timber and manufacturing sectors (page 167) under major industries. Your employment data (table 18) is from 1999. In the past 2 years the forest products sector has invested \$50 million dollars in new manufacturing facilities, creating over 150 direct family wage jobs with benefits in Port Angeles alone. This does not include additional logging and trucking jobs plus the jobs created from having a healthy economy. The Shelton area has also had facilities improvements and job additions matching those in Clallam County. Your draft does not reflect current economic data and the data you have is poorly written. The Washington Forest Protection Association has substantial data on the economic contributions of the forest products industry to the State of Washington. The Clallam County Economic Development Council could also have provided you with more updated and accurate employment information.

Response: The comment regarding annual earnings for workers in the timber supply and logistics being in excess of the \$18,636 is accurate. However, the comment reflects a misinterpretation of the information presented in Table 17. The data reflects total labor earnings in an industry, expressed in

thousands; in this case \$18,636,000, not the average annual earnings per worker.

We have updated the *General Management Plan* based on information from the U.S. Bureau of Economic Analysis for 2005 (See Table 21: Earnings by Industry for 2005 and Table 22: Full-time and Part-time Employees by Major Industry for 2005 in the final plan.) The data do substantiate the importance of forestry and the wood processing manufacturing industries in the local and regional economies. The *General Management Plan / Environmental Impact Statement* does not seek to diminish the importance of those industries to the local economy. At the same time, the data highlight the ongoing economic diversification and increasing contributions of inflows of income from commuting workers and non-earned income in the local economies. When coupled with the consolidation trends in the forest industries, these data suggest that the regional economies are in a period of economic transition, one in which the forest related industries are expected to remain an important economic cornerstone for the foreseeable future. Moreover, the industry is responding to the national and global scale forces of supply and demand for forest products and to the local costs of production of forest products. Declining numbers of firms in these economic sectors suggests that marginal firms which are less able to compete profitably are either ceasing operations or perhaps being acquired by other firms. Those macro-level forces and influences affecting the industry are occurring independent of and would be unaffected by the implementation of the park's general management plan and the scale of impacts associated with the boundary adjustments relative to the land base and industry is minor.

Regional Economy

Comments: The discussion of the local economy appears to be solely based upon a precursory utilization of the Census 2000 data. However, it does not appear that efforts were made to glean additional economic information and research from such sources as the State of Washington Department of Revenue; Department of Community, Trade and Economic Development; research entities at the University of Washington or Washington State University; nor the local economic development entities such as the federally supported Peninsula Development Authority, the various county economic development councils,

and municipal economic development officials. Outreach to these entities could have resulted in a more thorough assessment of the economic situation on the Olympic Peninsula and could have provided background information needed to undertake an analysis of specific proposals on local and regional economies.

One document that might be of interest and relevance would be the *Labor Market Analysis of Clallam County: A look at Wages and Employment between 1997 and 2004*, Daniel A. Underwood and Dan Axelsen, 29 Jun 2005. This report did extensive county-specific economic analysis of the changes in the timber, tourism, and other economic clusters in Clallam County. Consultation with the Clallam County Economic Development Council might have brought such a document to the attention of the Denver-based authors of the *General Management Plan*.

Response: The National Park Service reviewed additional sources of information and utilized the U.S. Bureau of Economic Analysis data for 2005. The document, *Labor Market Analysis of Clallam County: A look at Wages and Employment between 1997 and 2004*, Daniel A. Underwood and Dan Axelsen, 29 June 2005, was also reviewed. Each of these sources provides additional perspectives on the complex and dynamic social and economic environment on the Olympic Peninsula and were used to update the *General Management Plan*.

It is important to reiterate that the general management plan establishes the overall management direction for the Olympic National Park for the next 15 to 20 years. As such the plan was developed with an understanding of underlying historical trends, current conditions, and future trends, both within and surrounding the park. In establishing that vision, the National Park Service is charged with managing and protecting resources for the long-term interest of the American people. Consequently, a general management plan is, by its very nature, generally unresponsive to short-term or localized changes in economic conditions. Thus, the more “current” data did not alter the underlying economic assessments summarized in the *Draft General Management Plan / Environmental Impact Statement*, nor result in any substantive changes in the preferred alternative.

SOUNDSCAPES

Comment: Add a significance statement related to soundscape on page 9. Recognize Olympic National Park soundscape diversity and aural solitude as unique and significant.

Response: The significance statements were developed by park staff using the park’s enabling legislation and public input. As stated on page 9, these statements are meant to capture the essence of the national park’s importance to the country’s natural and cultural heritage, and are not meant to inventory park resources.

More information about soundscapes has been included in the plan under “Parkwide Policies and Desired Conditions” section (page 14) and the “Affected Environment” section (page 98) of the *Draft General Management Plan*.

Desired Conditions — Soundscapes

Comment: Under desired conditions for soundscapes, add the condition that a sound level meter will be used to measure noise levels (standards to be forthcoming) and noise limits will be enforced. Add establish one or more acoustic conservation areas and publish brochures for self-guided walks through these areas. Add the Park Service will perform a sound survey.

Response: Although the general management plan does not prescribe specific “acoustic conservation zones,” the activities of park management, concessioners, and visitors in all zones will be managed to minimize or mitigate noises produced by equipment. In addition, since the majority of the park is wilderness, there is protection for natural quiet and opportunity for experiencing natural sounds.

The desired condition to use a sound level meter is too detailed to include in a general management plan. Delineating acoustic conservation areas and performing a sound survey (should the Park Service decide to do these things) will be part of an implementation plan, and could be included in a parkwide soundscapes plan or the park’s wilderness management plan.

Comment: Under “Natural Soundscapes” and “Desired Conditions,” add “The Park Service will maintain one or more areas in a condition of

complete natural quiet (zero tolerance to human-caused noise intrusions) to provide an area for valuable baseline data.”

Response: Under the wilderness zoning, and in the future wilderness management plan, we would consider establishing a primeval zone as described in Table 2 of the final plan. This zone would have the maximum protection for natural quiet and the most opportunities for experiencing natural sounds.

Comment: Under “Strategies” add “Provide staff seminars about the acoustic environment of Olympic Park so that routine maintenance will be more aware of why quieter tools and practices are necessary even though they are sometimes more costly and time consuming.”

Response: The National Park Service already provides training to park staff on use of the minimum tool, including the use of quieter technology in the park. We also strive to use the best technology available (4 cycle or similar) when park equipment is replaced, and this strategy is reflected under “Parkwide Policies and Desired Conditions — Natural Soundscapes” on page 14.

Comment: Under "Natural Soundscapes" on page 14, the first paragraph summary should include the two fold value of natural soundscape management, namely that wildlife use the soundscape to carry out life essential message sending and receiving, and visitors enjoy the soundscape both poetically and musically, and can identify species by sound.

Response: We have updated the “Affected Environment” section to include this information. (The “Parkwide Policies and Desired Conditions” section is intended to state the National Park Service and Olympic National Park goals and strategies for managing soundscapes.)

Comments: On page 26, under “Desired Conditions Specific to Olympic National Park,” modify the first paragraph to state: “Natural processes, native species, natural soundscapes, and the interrelationships among them are protected”

Modify the third paragraph to state: “Present and future visitors enjoy the unique qualities offered in wilderness. These include the experiences of solitude, remoteness, natural quiet and natural soundscapes, challenge, self-sufficiency, discovery, and observation of an untrammelled ecosystem.”

On page 27, under “Strategies,” modify the third bullet to state: “Define a range of desired conditions for wilderness resources, visitor experiences, wilderness character (including natural soundscapes), and management and operational techniques.”

Response: The desired conditions as written in the *Draft General Management Plan* speak directly to elements defined in the Wilderness Act. The four federal agencies that manage wilderness (Bureau of Land Management, U.S. Fish and Wildlife Service, U.S. Forest Service, and National Park Service) describe the elements of "wilderness character" (on the basis of the Wilderness Act) as: untrammelled, undeveloped, natural, and providing outstanding opportunities for solitude or a primitive and unconfined type of recreation.

Affected Environment — Soundscapes

Comment: On page 3 and pages 98-99, specific references to sounds unique to Olympic National Park should be mentioned.

Response: The following text has been added to page 98 and 99. “Natural sounds and natural quiet are also important parts of the experience that visitors seek in Olympic National Park. Numerous sounds characterize the park—the impossibly elaborate song of a winter wren, bugling bull elk declaring their dominance, the rhythm of waves over pebbles on a beach, the piercing whistle of an Olympic marmot, the crisp sound of wind through subalpine fir, the soft silence of falling snow, or the haunting flute-like call of a varied thrush. Even if the source is impossible to find, sounds inform visitors of what is around them.”

The following text was added to the bulleted text: “Sounds that humans may not hear, but are nonetheless important to wildlife, such as ultrasonic sound used by bats for navigation or to locate prey.”

Comment: On page 143, expand the description to include winter listening as an activity that emphasizes aural solitude. Snow provides a natural sound deadening material. The dryer, rarer, and colder atmospheric conditions also reduce sound transmission.

Response: The following text has been added under Winter Snow-based Recreational Opportunities: “In addition to skiing and snow play

activities, the Olympic Mountains provide wondrous winter scenery and quiet solitude as snow dampens the sounds of mechanized, modern life.”

Environmental Consequences — Soundscapes

Comment: Under Table 4: Summary of Key Impacts - Soundscapes, alternative A (as is) may lead to increased losses of natural quiet (some drastic) and possibly severe loss of acoustic features and significant natural soundscapes. However there is no basis to draw a more optimistic prognosis for any of the other alternatives. There needs to be a sound survey. The conclusions presented in this chart are not the result of research but opinions. It would be better to state these as management goals rather than summary findings.

The definitions of long-term and short-term impacts don't fit well with noise impacts. Redefinition might be warranted.

Under Soundscapes, the discussion on negligible impacts should end by stating “...mostly immeasurable and inaudible.” “Any construction of new facilities or utilities under this alternative would cause short-term adverse impacts on local soundscapes in the construction area.” This statement sounds logical but is not supported by any research that I know. Just because a noise is no longer heard does not mean that the impact is over or that long-term damage has not been done to the environment.

Response: This table provides a summary of impacts. The potential impacts to soundscapes from the alternatives are discussed in detail on pages 201, 236, 275, and 312. We used the best available information for the analysis of soundscape and the methodology and impact threshold definitions, which in this case included input from the National Park Service Soundscapes office.

The definitions for moderate and major impacts are from the standpoint of the visitor experience being disturbed or affected. The definitions do not include impacts related to wildlife or other natural resource disturbance, which are evaluated separately within the “Environmental Consequences” section of the *Draft General Management Plan*.

We have changed the definition of negligible, under soundscapes (Page 277 of the final plan) to “Natural sounds would prevail; human-caused noise would be absent or very infrequent, mostly immeasurable, and inaudible.”

Regarding potential long-term damage or impacts from construction sounds, we have modified paragraph 3, page 376 of the final plan to read “Any construction of new facilities or utilities under this alternative would cause short-term adverse impacts on local soundscapes in the construction area as experienced by park visitors. Wildlife species may experience different and potentially longer-term impacts related to noise disturbance.”

Environmental Consequences — Cumulative Effects

Comment: On pages 202, 237, 276, and 313, the plan states that: “Logging operations near park boundaries create noise that detracts from natural soundscapes in the park.” The level of sound and distance traveled would not cause noticeable detractions from natural soundscapes. Your *Draft General Management Plan* lacks the research and science to make this statement.

Response: U.S. Forest Service studies have shown that sound from heavy equipment does travel some distance and does have the potential to alter the natural soundscape. This is how effects to listed species are determined (USFS 2001). The sound level and distance traveled also depends on the specific area's terrain and vegetation, so it is difficult to quantify this information. However, as stated on page 202, there is potential that activities using heavy equipment on lands adjacent to Olympic National Park can be heard within the park and thus do detract from the natural soundscape. Other activities, such as overflights, can also create adverse impacts to the natural soundscape of the park. Generally these effects are minor to moderate and adverse.

Comment: Soundscape management needs to address noise issues outside of park boundaries.

Response: Noise issues outside park boundaries were addressed in the cumulative effects analysis sections of the plan (pages 202, 237, 276 and 313).

Mitigation — Soundscapes

Comment: Standard noise abatement measures do not exist for places of natural quiet. There needs to be specific measures developed for each area under consideration, preferably by a consulting acoustic ecologist.

There needs to be the addition of a professional acoustic ecologist to the planning staff of the park (not every park needs this, but Olympic National Park does).

Response: Current staffing and budget priorities do not include hiring an acoustical ecologist.

Developing specific noise abatement measures for each area (should the Park Service decide to do this) will be part of an implementation plan, and could be included in a parkwide soundscapes plan.

TOPICS DISMISSED

Environmental Justice

Comments: The failure of the *General Management Plan* to undertake a thorough analysis of such economic impacts may have resulted in the National Park Service dismissing the need to comply with Executive Order 12898, “Environmental Justice.” As we understand it, this executive order requires agencies to analyze their actions as to how they will affect communities that include minority and/or low-income populations. Western Clallam and Jefferson Counties fall within this description. However, the reliance by the National Park Service on multi-county statistics, and its failure to utilize readily available research at a more localized community level (See for example, Dr. Annabel Kirschner's *Changing Conditions on the Olympic and Kitsap Peninsulas: 1990-2000*, available on line at <http://www.crs.wsu.edu/outreach/ark/onrc/index.html>), appears to have resulted in the National Park Service determining it did not need to comply with this Executive Order. The City of Forks' population in 2000 consisted of over 15% of the population being “Hispanic or Latino (of any race),” and 5% being “American Indian and Alaska Native.” In addition, 14.6% of the families and 20% of the individuals living in Forks had incomes that were at or below the federal poverty levels. (Table DP-1 and DP-3, Geographic area: Forks City, Washington, U.S. Census Bureau, Census 2000).

The plan dismisses, out of hand, the fact that communities and populations in the western portion of Clallam and Jefferson counties do, in fact, suffer from low income and are below the poverty level in many cases. When the private land is taken from them, the result is severe impact to their health and well-being. However, since the plan fails to admit that, here, is a population dependent on land ownership, the *Draft General Management Plan* is deliberately misleading.

Response: Executive Order 12898, “Environmental Justice in Minority and Low-Income Populations,” directs federal agencies to assess whether their actions have *disproportionately high* and adverse human health or environmental effects on minority and low-income populations. Agencies must specifically analyze and evaluate the impact of proposals on minority and low-income populations and communities, as well as the equity of the distribution of the benefits and risk of the decision in the NEPA document. The National Park Service determined that this does not apply, as noted in the “issues dismissed” section of the *Draft General Management Plan* (see ESM95-3 [USDOJ 1995] and ESM98-2 [USDOJ 1998]).

Environmental Justice was examined and appropriately dismissed as an impact topic for the reasons specified on pages 47-48.

However, through the public comment process, additional information about impacts to the socioeconomic environment has been added to the *Final General Management Plan* in the “Affected Environment” and “Environmental Consequences” sections of the plan.

Comment: The Park Service dismisses environmental justice. There should not be adverse health or environmental effects on a particular minority or low-income group because of agency policy. We ask the Park Service to heed this when the Tribe seeks to exercise its treaty rights within park boundaries, throughout the Quileute “Usual and Accustomed Areas.”

The Tribe disagrees with the Park Service’s dismissal of environmental justice requirements. The proposed changes of land status may have a disproportionate effect on members of the Hoh Tribe who are minorities and of a low-income community. The Park Service should consider the effects of land changes to tribal member treaty

rights and economic ability. The Park Service should also take this into account in the omission of hiring any Hoh Tribe members to staff the visitor centers at Kalaloch and Hoh Rainforest. There are a number of proposed actions which may impact the tribe and the Park Service should consider and analyze those impacts in regards to the effects on tribal members and the community.

Response: The general management plan dismissed further evaluation of environmental justice because the initial analysis determined that, while the potentially effected community does include minority and/or low-income populations, the environmental effects of implementing the plan are not likely to disproportionately effect low-income or minority populations. This is fully discussed on pages 47 and 48.

The National Park Service is committed to working collaboratively with area tribes throughout the implementation phases of the general management plan to prevent potential disproportionate adverse health or environmental effects on tribal members.

Unique Farmlands

Comment: We are uncertain that the assumption that the plan would not impact unique farmlands is correct, for both the alternative B and alternative D for the Lake Ozette region may in fact impact lands that were once farmed and could be farmed again. Further analysis may be required to determine if in fact the actions in the general management plan have “no impacts on primary or unique farmlands” in the Ozette basin.

Response: No area within the park or the proposed boundary expansion area meets the description of prime or unique farmland as provided by 7 U.S.C. 4201(c) (1) (A) or 7 U.S.C. 4201(c) (1) (B); therefore, as explained on page 40 of the *Draft General Management Plan*, this topic was not considered further.

ADDITIONAL TRIBAL CONCERNS

Comment: The author does not grasp the unique situation of the Washington Treaty Tribes with off-reservation reserved rights. Most of the treaty tribes are having access disputes with the Park Service and this issue needs to be corrected.

In the Olympic Peninsula Tribes section of the *General Management Plan* (page 135), the paragraph regarding the “usual and accustomed areas” of the Quileute and Hoh Tribes seems to simplify and may, as a result, inaccurately reflect these areas.

Response: Olympic National Park is committed to continuing and improving its government-to-government relationship with federally recognized tribal governments of the Olympic Peninsula. We have added text about the relationship of the eight tribes to the park on pages 14, 37, and 211-214 of the final plan, and have updated the language on pages 14 through 17 to include more information on the trust relationship between American Indian tribes and the federal government.

Information on the “Usual and Accustomed Areas” for the Quileute Tribe was obtained from *United States v. Washington*, Finding of Fact No. 108, 384 F. Supp. 372, and information on the Hoh “Usual and Accustomed Areas” was obtained from *United States v. Washington*, Finding of Fact No. 39, 384 F. Supp. 359.

Comment: The Park Service is not master of its domain. It shares jurisdiction with the eight tribes listed throughout the *Draft General Management Plan*, with Washington Department of Natural Resources, Department of Fish and Wildlife, Department of Ecology, Olympic Coast National Marine Sanctuary, U.S. Fish and Wildlife Service, Environmental Protection Agency, and others. This multiple jurisdiction deserves a full discussion in your opening selections.

Response: The Park Service recognizes that the eight tribes, the state of Washington and other federal agencies have jurisdiction within Olympic National Park through treaties, statutes, executive orders, and other law and policy.

Some of the laws and regulations that apply to Olympic National Park are listed on pages 10 and 11 of the *Draft General Management Plan*. However, this list is not intended to be all inclusive, as it is outside the scope of a general management plan to define the precise nature and extent of all governmental or agency jurisdictions within the boundaries of the park.

For instance, the Park Service recognizes that tribes have jurisdiction over their own members exercising off-reservation treaty fishing rights

within Olympic National Park. The Park Service recognizes that its coastal boundary overlaps the Olympic Coast National Marine Sanctuary boundary (page 110) which is the “higher high water line” adjacent to park lands. The Park Service recognizes that the state of Washington ceded exclusive jurisdiction to the United States over lands within Olympic National Park, retaining jurisdiction to serve civil and criminal process and to tax, and retaining jurisdiction over certain highways (Page 149) (See also, RCW 37.08.210). However, it is beyond the scope of this *Draft General Management Plan* to prepare a comprehensive jurisdictional inventory of Olympic National Park.

Comment: Page 76 states: “Designate river and stream access/crossing points, and use barriers and closures to prevent trampling and loss of riparian vegetation.” This might affect fishing access for Quinault fishers, which should be addressed so as not to impair treaty protected fishing rights.

Response: The Park Service recognizes the Quinault Nation’s treaty rights to fish, hunt, and gather as these rights have been legally defined. Further defining the application of tribal treaty rights is beyond the scope of the general management plan, and it is not our intent to diminish treaty rights or otherwise resolve unadjudicated treaty rights in the general management plan. This has been clarified in the *Final General Management Plan*. Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

Consultation

Comments: Consultation on projects in essential fish habitat need to be with the tribe as well as NOAA Fisheries.

The section on the management of fish and wildlife does not, but should include consultation with affected tribal governments regarding projects within essential fish habitat.

That plan states that park operations and wilderness functions are coordinated in the park to manage and protect natural and cultural resources in wilderness and preserve wilderness character. This section does not mention coordination with the tribes and it should.

The Nation is interested in forming a long-term working relationship to address our ongoing concerns over the plan, its implementation, and other issues affecting the Nation as a neighbor to the park. We want to establish a meaningful consultation process that will result in meeting both the park’s goals and the Nation’s goals.

Response: Olympic National Park is committed to continuing and improving its government-to-government relationship with federally recognized tribal governments (see page 12 of *Draft General Management Plan*). In accordance with the Presidential Memorandum of April 29, 1994 and Executive Order 13175, “Consultation and Coordination with Indian Tribal Governments,” Olympic National Park will continue to work with Indian tribes on a government-to-government basis to address issues concerning Indian tribal self-government, trust resources, and Indian tribal treaty and other rights and concerns, including projects that occur within essential fish habitat. We have updated the final plan to clarify this.

Olympic National Park will work closely with the tribes in implementing the general management plan to ensure that existing treaty rights are not affected by actions within the plan. This has been clarified in the final plan. Olympic National Park will continue to work with the tribes as the wilderness management plan and other plans are developed to address tribal concerns and ensure that existing treaty rights are not affected by actions within these plans.

We have modified the text on page 32 of the final plan, Objective 6, under “Parkwide Policies and Desired Conditions” to read “Park operations and wilderness functions are coordinated in the park to manage and protect natural and cultural resources in wilderness and preserve wilderness character. Management is coordinated with the U.S. Forest Service to provide consistency in regulations, standards, and guidelines to the extent feasible. The Park Service will continue to work with other local and regional groups, communities, and agencies, and tribal governments to preserve wilderness values.”

Comment: The effects on the Hoh Tribe of implementing alternative C with its overall mission of increasing visitation were not adequately reviewed. The Tribe may be impacted in a number of ways including more congestion on roadways, increased competition for natural areas, potential increased disturbance in hunting/gathering areas,

and competition for future economic development among others. How will relocation of Highway 101 in the Kalaloch area impact tribal clamming and gathering? How will it affect transportation to major population or business centers? The Hoh Tribe has a long-term desire to acquire more land in the vicinity and create a tribal-managed campground and/or RV park. Will the park's increase in campgrounds directly compete with the Tribe?

Response: Alternative C includes improvements to, not expansion of, the campgrounds at Kalaloch (see page M36). Alternative C also calls for the Hoh campground to be relocated out of the floodplain (M31). If no location in the park were to be determined feasible, the National Park Service would work with outside entities, including area tribes, to develop camping opportunities outside the park.

Also, under the preferred alternative, there will be no large expansion of campgrounds within the park. There may be slight increases in sites or redesigned/relocated of campsites or campgrounds at Sol Duc and Ozette; in other areas, campgrounds will be retained as feasible (such as at the Hoh, Kalaloch, and South Beach).

Alternatives C and D both call for the National Park Service to work with the Washington Department of Transportation to explore options for relocating portions of Highway 101 outside the coastal erosion zone to ensure future access for visitors and through traffic (pages M35 and M36). As stated on page 302, in the section "Environmental Consequences of Alternative C," there could be road closures or access restrictions during construction, resulting in short-term adverse impacts to traffic, but in the long-term, there will be beneficial effects by maintaining the roadway in a more sustainable manner. The goal of both alternatives C and D is to maintain access, and nothing in these alternatives will diminish existing tribal treaty rights.

Employment

Comment: The Hoh Tribe feels that there should be at least one full-time position at each of the park visitor centers (Hoh Visitor Center and Kalaloch Information Center), to provide for Native American culture and heritage as it relates to the local environment. The Hoh Tribe envisions this as a position that should be funded by the National

Park Service preferably or perhaps a joint grant obtained between the tribe and the park, but the position should be a Hoh Tribal, not a National Park Service employee. The position would provide long-term employment for Hoh Tribal members. While it may be easier to find alternate funding for a youth position, we feel the position should instead be a mature individual that has a background in tribal culture, history, and traditions.

Response: Park staffing and hiring practices are beyond the scope of a general management plan, but the Park Service nevertheless appreciates the Hoh Tribe's concerns related to tribal representation on the staff at the Hoh Visitor Center and Kalaloch Information Center. We are quite willing to work with the Hoh Tribe to identify alternative funding sources and to work within current federal hiring authorities. The park's current funding levels do not allow for creating new positions. Over the past three years, the Park Service has intentionally left over 30 permanent positions unfilled after employees retired or transferred, as there has not been adequate funding to fill these job vacancies. Alternative funding sources might also be restricted because the Park Service is limited by the types of appropriation that may be used for hiring permanent employees.

We commit to sending job announcements to all eight tribes for available National Park Service job opportunities. If the National Park Service obtains funding for any new positions, we will consider qualified tribal members along with other qualified applicants for these positions. In addition, we are quite willing to work with the tribes to seek grants for hiring tribal positions to work in the park.

Comment: Ethnographic Representation at the Hoh Rainforest and Kalaloch Visitor Centers. Geographically, the Hoh Tribe is the most isolated tribe from major employment and population centers. In the socio-economic section of the *Draft General Management Plan*, the Hoh Tribe has the distinction of having the highest unemployment rate and lowest per capita income of any reservation surrounding the park. The Park Service mentions, at its visitor centers in a number of ways and through literature, the Hoh Tribe and its members and their heritage in the area. However, to date there has been no effort by the Park Service to bring actual Hoh Tribe members into the public awareness at these two visitor centers. The Tribe feels that it would be of great value to the 250,000 plus visitors

each year if they were able to meet and speak with a Hoh Tribal member at one of these visitor centers.

Response: Alternative D, the preferred alternative, calls for partnerships with area tribes and other agencies that will result in a better understanding of shared values and issues, and lead to more integrated interpretive and educational programs that address multiple audiences (pages 335 and 336). A new multi-agency/tribal visitor facility within or outside the park in the Kalaloch area, focusing on coastal resources, will offer greater and more in-depth interpretation of the cultural and natural resources and heritage of the coastal area (page 334). The park is committed to working closely with the tribes to develop appropriate exhibits and information on area tribes and ethnographic resources.

Comment: The Center should offer Hoh Tribe members a means to consign tribal crafts and articles for visitors to purchase.

Response: This level of detail is beyond the scope of the general management plan, however, the National Park Service has a variety of mechanisms to allow the sale of native crafts and articles to the public and we would be happy to explore these with the tribe. These include working through contracted concessioners (e.g. Kalaloch), through the cooperating association which provides book and map sales at the Hoh Visitor Center, or through special use permits. Sales may also be authorized as part of cultural demonstrations given for the public. Again, we will be happy to work with the tribe, within the limits of our authorities, to pursue ways for this to happen.

Fisheries Resources

Comment: Under “Native Species” on page 23, the strategy to promote harvest and management practices that protect wild salmonids is admirable. However, it appears to be an effort by the National Park Service to insert itself into a well-defined and litigated system of salmonid management that involves the State of Washington and the recognized treaty tribes of the Olympic Peninsula working together as co-managers of said resource. While the National Park Service may have interests in these activities, those interests must be treated similar as any other interested party. In addition, National Park Service should be cognizant that its role in prescribing management practices is to be

limited to those portions of streams and rivers within its existing boundaries. Advocating for regulatory changes outside of the park boundaries on the manner of harvest regulations, seasons, etc., in effect interferes with the rights of state and treaty tribe co-managers acting to protect each entities specific management rights.

On page 23 under “Native Species” add after “Promote harvest and management practices that protect wild salmonids. Work with area fisheries managers to implement escapement levels necessary to achieve the full role of anadromous fish in the ecosystem...” in cooperation with tribal governments to preserve and promote sustainable, harvestable levels of fish populations.

Response: We have updated the text in the final plan to reflect cooperation with tribal governments.

In accordance with NPS *Management Policies 2006* (4.1.4.) the National Park Service will pursue opportunities to improve natural resource management within parks and across administrative boundaries by pursuing cooperative conservation with public agencies, appropriate representatives of American Indian tribes and other partners.

Olympic National Park fishing regulations apply only to areas within the park’s boundaries and support the protection of anadromous fish in the ecosystem. We believe that without National Park Service fishing regulations regulating the amount of non-Indian harvest on park lands, escapement levels developed by the tribes and the state may not be achieved.

The enabling legislation for Olympic National Park specifically states, “...nor shall any fish be taken out of any of the waters of the park, except at such seasons and at such times and in such manner as may be directed by the Secretary of the Interior. The Secretary of the Interior shall make and publish such general rules and regulations as he may deem necessary and proper for the management and care of the park and for the protection of property therein” (Section 3). Nothing in the Act affected the rights reserved by treaty to the Indians of any tribes (Section 5). Regulations are published in 36 CFR 7. 28 and fishing regulations are updated annually in coordination with the State of Washington and Olympic Peninsula tribes.

Comment: The Park Service's assertions that it has co-management responsibilities over fish and

shellfish harvest are unacceptable and must be stricken from the plan.

Response: The Park Service is not described as a “co-manager” in the *Draft General Management Plan*. To the extent the comment refers to the role formally recognized by the court under its continuing jurisdiction in *U.S. v Washington*, the Park Service agrees that it has not been formally recognized under the case law as a “co-manager” and, consequently, the term is not used in either the *Draft* or the *Final General Management Plan*.

However, the Park Service does have a role in the management and administration of resources. Its role as manager of the non-Indian fishery within the park is established by statute, regulation, by the state of Washington’s cession of jurisdiction, and by deed. (See 36 CFR 7.28, and the July 28, 1988 Governor’s Deed from Washington State Parks and Recreation Commission to the United States conveying the State’s right, title, and interest to the tide lands in Jefferson and Clallam Counties subject to a covenant requiring the National Park Service to consult with the State, and to keep the tide lands “open to fishing and to the taking of shellfish in conformity with the laws and regulations of the State of Washington.”) The Park Service attempts to comply with the state in this regard. This information has been clarified in the final plan in Chapter 1 under “Laws, Regulations, and Servicewide Mandates.”

In accordance with National Park Service policies, the Park Service will continue to pursue opportunities to improve natural resources management within the park and across administrative boundaries by pursuing cooperative conservation with public agencies, appropriate representatives of American Indian tribes, other traditionally associated peoples, and private landowners (NPS *Management Policies 2006*, 4.1.4). We will continue to develop agreements, when appropriate and in accordance with National Park Service policy, with federal, tribal, state, and local governments and organizations to coordinate plant, animal, water, and other natural resource management activities in ways that maintain and protect park resources and values.

Comment: Language specific to “jurisdiction over shellfish harvest” should specify that Olympic National Park has no jurisdiction over beach access or resource harvest by members of treaty tribes. Nor does Olympic National Park have jurisdiction

over setting annual harvest goals or allocations which are determined by the state of Washington and the treaty tribes as co-managers.

Response: The intertidal zone of Olympic National Park is an area of exclusive federal jurisdiction. This information has been clarified in the final plan under “Affected Environment — Intertidal Areas.” As such, the National Park Service is the manager of non-tribal natural resources in this area. The National Park Service has a legal right to set harvest goals and annual allocations for the non-tribal public. Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

Comment: The Nation disagrees that the Olympic National Park has any role to implement escapement goals. The second sentence “Work with area fisheries managers to implement escapement levels necessary to achieve the full role of anadromous fish in the ecosystem” should be deleted.

Response: “The National Park Service will pursue opportunities to improve natural resource management within parks and across administrative boundaries by pursuing cooperative conservation with public agencies, appropriate representatives of American Indian tribes and other partners” (NPS *Management Policies 2006*, 4.1.4. Partnership Policies). The National Park Service will continue to coordinate park actions with the tribes and the state. The National Park Service also recognizes that fish management and other activities outside the park boundary may affect resources within the park.

Park angling regulations are set annually in consultation with Washington Department of Fish and Wildlife and Olympic Peninsula tribes. Olympic National Park fishing regulations support protection of anadromous fish in the ecosystem. We believe that without National Park Service fishing regulations regulating the amount of non-Indian harvest on park lands, escapement levels developed by the tribes and the state may not be achieved.

The enabling legislation for Olympic National Park specifically states, “...nor shall any fish be taken out of any of the waters of the park, except at such seasons and at such times and in such manner as may be directed by the Secretary of the Interior. The Secretary of the Interior shall make and publish such general rules and regulations as he may deem

necessary and proper for the management and care of the park and for the protection of property therein” (Section 3). Nothing in the Act affected the rights reserved by treaty to the Indians of any tribes (Section 5). Regulations are published in 36 CFR 7.28 and fishing regulations are updated annually in coordination with the State of Washington and Olympic Peninsula tribes. Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

Comment: The Nation takes issue with the lack of scientific basis for the no-harvest decision.

Response: Federal regulations prohibit the harvest of wildlife and plants in Olympic National Park. Recreational fishing, including the harvest of razor clams and other non-fish marine species, is allowed, subject to National Park Service management policies that require harvested species to be managed so there is no effect on the natural distributions, densities, age-class distributions, and behavior of the harvested species, or on native species that use, or are used by the harvested species. Park fishing regulations do not affect tribal treaty rights.

Fisheries management in the National Park Service is directed by policy and guidelines with roots in the National Park Service Organic Act of 1916. The Act directs the National Park Service to manage parks to “conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”

The primary objectives of fisheries management, including razor clams and other non-fish species, in the National Park Service are to 1) maintain naturally functioning aquatic ecosystems; 2) protect and perpetuate native aquatic species and natural habitats; 3) focus on preserving or restoring the natural behavior, genetic variability and diversity, and ecological integrity of native fish populations; and 4) provide quality and diverse recreational fishing opportunities only when ecosystem impacts are minimal.

The scientific basis for recreational angling is based on monitoring of trends in abundance of Olympic National Park stocks by National Park Service, Washington Department of Fish and Wildlife, and

treaty tribes. Additionally, fishing regulations are set annually in consultation with Washington Department of Fish and Wildlife and Olympic Peninsula tribes. Olympic National Park fishing regulations generally emphasize catch-and-release of wild fish and retention of hatchery and non-native fish.

Comment: The Tribe is very interested in acquiring data that the Park Service is using to determine baseline conditions; the Park Service should consult with the Tribe on the suitability of data used for such purposes in all environments, not just the marine environment.

Response: The Park Service is happy to share baseline natural resources data with area tribes. These data can be made available to the tribes as soon as data management procedures and quality assurance are completed. The park is committed to collaborating and consulting with the tribes.

Partnerships with Area Tribes

Comments: The purpose of the general management plan should be expanded to include: What are the ways and to what extent can the Park Service work with the tribes to protect their established rights and interests regarding issues and resources affected by Olympic National Park?

On page 41, under Tribal Relations, add, “How can the Park Service work to improve tribal member opportunities in the park?” and

“How can the Park Service work to ensure treaty rights for tribal members?”

The Park Service thus far has not had a very good record in making and keeping cooperative partnerships and agreements with the tribe. The tribe is very interested in working with other resource co-managers in the tribe’s “Usual and Accustomed” Areas.

The Tribe would like to work more cooperatively and collaboratively with the park, and be involved in more park projects, including having a tribal member on site during project work and having a plan for discovery.

Response: Olympic National Park is committed to continuing and improving its government-to-

government relationship with federally recognized tribal governments (see page 12 of *Draft General Management Plan*). Olympic National Park will continue to work with Indian tribes on a government-to-government basis to address issues concerning Indian tribal self-government, trust resources, and Indian tribal treaty and other rights and concerns.

The Park Service reaffirms its policy concerning trust resources and will “interact directly with tribal governments regarding the potential impacts of proposed National Park Service activities on Indian Tribes and trust resources”...and “will ensure that effects on trust resources are explicitly identified and evaluated in consultation with potentially concerned tribes and that they are addressed in planning, decision, and operational documents.” (NPS *Management Policies 2006*, 1.11.3) The Park Service also recognizes case law that federal agencies must ensure that treaty reserved rights are not impaired or abrogated by the action of federal agencies.

The text on page 53 has been updated in the *Final General Management Plan* to more accurately reflect the park’s goals of improving coordination and cooperation with the tribes to better protect park resources, improve natural resource management, and provide visitor opportunities.

The Park Service is committed to pursuing opportunities to improve natural resource management within the park and across administrative boundaries by pursuing cooperative conservation with American Indian tribes in accordance with Executive Order 13352, “Facilitation of Cooperative Conservation” and NPS *Management Policies 2006* (4.1.4). Examples of these opportunities include developing agreements with tribal governments, when appropriate, to coordinate plant, animal, water, and other natural resource management activities in ways that maintain and protect park resources and values. Cooperative conservation may also involve coordinating management activities, integrating management practices to reduce conflicts, coordinating research, sharing data and expertise, exchanging native biological resources for species management or ecosystem restoration purposes, establishing native wildlife corridors, and providing essential habitats adjacent to or across park boundaries.

In accordance with NPS *Management Policies 2006*, the National Park Service will support the establishment of formal and informal agreements with tribes, outside the general management plan process. An example is the agreement between the Park Service and the Lower Elwha Klallam Tribe to restore the Elwha River ecosystem and fisheries. We are currently working with the tribes to interpret traditional basketry in the form of a book, *From the Hands of a Weaver: Olympic Peninsula Basketry through Time* that is similar to *Native Peoples of the Olympic Peninsula: Who We Are*, which was another intertribal and park project.

The Park Service is currently working with the Olympic Peninsula Intertribal Cultural Advisory Committee and would support other partnerships with area tribes.

Comment: The Tribe would like to work with the National Park Service to develop a mechanism that encourages park visitors who intend to use the Ozette parcel to obtain tribal permits in addition to park permits.

Response: The National Park Service is interested and willing to work with the Tribe to encourage park visitors to obtain tribal permits to use the Ozette parcel.

Comment: Include tribal participation in education and outreach; invite Tribe to help train park staff; improve signs throughout the park regarding treaty rights.

Response: Olympic National Park staff and visitors have benefited from tribal participation in staff training and in the development of educational materials and programs (e.g. exhibits, brochures) in the past and hope this involvement will continue and be expanded in the future.

While the details of staff training and park signs are beyond the scope of this plan, the plan does identify the need to expand the number and variety of education programs (page 148). One of the desired conditions for “Visitor Use and Experience, Education and Outreach” is that education programs are available; one of the strategies to accomplish this is to develop outreach programs for and with area tribes (page 33).

The preferred alternative calls for the Park Service to partner with outside agencies and tribes to develop opportunities for regional education and interpretation (page 68). The preferred alternative includes education partnerships with area tribes, with the goals of developing better understanding of shared values and issues, and more integrated interpretive and educational programs (pages 335 and 336). See also pages M28, M36, M44.

Comment: The Quinault Nation is very interested to work with the Park Service to display our tribal culture in the park.

Response: While the details of interpretive displays and projects are beyond the scope of this plan, the Park Service is committed to working closely with the tribes to develop appropriate programs, exhibits and information on area tribes and tribal cultures.

Working collaboratively with the Quinault Nation to expand the types of education currently offered will help achieve the desired conditions and strategies shown on page 33 of the *Draft General Management Plan*. The preferred alternative calls for partnerships with area tribes and other agencies that will result in a better understanding of shared values and issues, and lead to more integrated interpretive and educational programs that address multiple audiences (pages 335 and 336).

Comments: The Park Service should also partner with the Tribe on noxious weed control in the drainage since the park may have infestations on either side of lands that the Tribe is doing control operations on.

The Park Service should coordinate noxious weed control programs with the Nation to maximize the efficiency and effectiveness of controlling noxious weeds upstream and downstream of reservation boundaries.

Response: The Park Service appreciates the existing collaboration (through the Olympic Knotweed Working Group and Elwha Restoration Project) with seven peninsula tribes on exotic plant control and plans to continue this collaboration in the future. Expanding this sort of cooperative effort to include all eight peninsula tribes would be beneficial to all parties.

Comment: The Park Service should partner with the tribes to obtain funding for wetland regeneration and protection in lands outside the

park. These areas between the upper sections of the park and the coastal sections are still important, especially regenerating wetlands that may feed the water table to park lands below.

Response: According to *NPS Management Policies 2006* (1.6), cooperative conservation beyond park boundaries is necessary as the National Park Service strives to fulfill its mandate to protect park resources and values. On page 16, we identified strategies related to ecosystem management, including collaborative planning efforts with adjacent land managers and tribal governments.

While the specifics of implementing these strategies is beyond the scope of the general management plan, the Park Service would be happy to collaborate with area tribes in cooperative conservation efforts, within the limits of our authority and as staffing levels permit.

Comment: The Park Service should partner with the Jamestown S'Klallam Tribe to develop a visitor interpretive center in Blyn.

Response: The preferred alternative calls for the Park Service to partner with outside agencies and tribes to develop opportunities for regional education and interpretation (page 68). This alternative also includes education partnerships with area tribes, with the goals of developing better understanding of shared values and issues, and more integrated interpretive and educational programs (pages 335 and 336).

While the details of specific projects are outside the scope of this plan, the Park Service is interested in working with all area tribes to develop education partnerships and opportunities.

Project-Specific Questions

Comment: No plans or actions addressed restoration or mitigation projects in the Hoh River valley. Recognizing that not all habitat-loss mitigation projects could be listed in the plan, the Hoh Tribe identified three projects that should be included as priority. These projects should be prioritized separately from any road maintenance issues that may arise in the near future that would require consultation with the tribe and may warrant modification to mitigation priorities. The projects to be added to the Olympic National Park Plans and Actions section are as follows:

1) Fish access into “Boundary Pond” on the Upper Hoh Road. Conduct an assessment of alternatives including an alternative that links the adjacent wall-based channel to the east into Boundary Pond and provides an appropriately sized outlet from the east end of Boundary Pond to an existing channel south of the road that provides access from the river to the Pond. This alternative should include a log jam component that would provide protection to the pond outlet and the road from future river meander.

2) Our primary concerns regarding the current draft plan relate back to previous resource issues and management agreements between the Hoh Tribe and the Olympic National Park. Previous mitigation agreements have not been honored by the Park Service that dealt mainly with fish passage (Boundary Pond, Taft Pond and outlet channel, E. and W. Twin Creek culvert replacements) and replacement and maintenance of the primary access (Upper Hoh Road in the vicinity of Boundary Pond) into the Hoh Rain Forest segment of Olympic National Park. These unmet agreements have had serious impacts on the fisheries resource within and downstream of the Olympic National Park boundaries, impeding access for juvenile and adult salmonids into valuable off-channel rearing habitat (Boundary Pond) and potential spawning reaches.

3) Fix two fish barrier culverts on East and West Twin Creek where they cross the Upper Hoh Road within Olympic National Park. Any analysis of alternatives should utilize the Development Advisory Board (DAB) and include all feasible alternatives, including temporary road closures and single lane bridges. Addition of large woody debris to the rip-rap barb located at the mouth of the Taft Pond outlet near the Hoh visitor center.

Response: We have updated the text on pages 48 and 151 of the final plan. The Park Service remains committed to the protection of natural resources and habitat restoration as one of its primary missions and regrets that funding and other resources are not always available to move as quickly as we would like.

The park staff first requested funding in 1996 through the National Park Service line-item construction program to replace the culverts on East and West Twin Creeks because they posed a barrier to fish. The funding proposal was entitled “Remove Salmon Obstructions/Construct Bridges”;

it was eventually funded in 2001 for the amount of \$828,000. Subsequent geotechnical input, traffic flows study, and more specific design development, as well as independent review of the above information and increasing construction costs escalated the cost of the project to over three million dollars. The project went through two Department of the Interior reviews including value analysis to look at all feasible alternatives. Despite this, the project costs escalated to the point where, as per policies, the project was dropped from the funding queue and will need to compete again with projects from throughout the nation with more accurate costs reflected.

In the interim, severe flooding in the side channels along the Hoh road in November 2006 completely washed away the culverts at West Twin Creek and permanent repair of this site will include a two lane bridge. Completion of this bridge is scheduled for early 2008. Minimal damage occurred at East Twin Creek and a funding proposal for that site will be submitted again through appropriate funding channels.

The flooding in November also severely impacted the outlet of Taft Pond, completely blocking it and making it impassable to fish. The outflow has been temporarily reopened but the permanent repair will include woody debris. The Taft Pond and outlet channel project is also in progress and will likely be completed as part of the repairs from the late 2006 storms. The park staff requested project funding to address issues at the Boundary Pond and received it in 2005 and 2006. The engineering design for the Boundary Pond project is currently underway. Until design is completed, it is unclear whether or not the project will be feasible.

Comment: The plan makes no commitment to altering the current status regarding road placement, maintenance, or protection in the Quinault floodplain. In addition, the plan does not mention the Park Service bridge across the Quinault River, a structure that causes major impairment to hydrologic processes on the floodplain.

Response: Desired conditions for rivers and floodplains are shown on page 19. The preferred alternative (page M44) calls for year-round road access to be retained along the existing Quinault area roads, using methods that minimize adverse effects on river processes and aquatic and riparian processes to the extent possible. It also states that if road relocation away from the river meander areas

is feasible, wilderness boundary relocations would be sought and further notes that relocations of the roads might be necessary due to river movement.

Specific project details are beyond the scope of a general management plan and are not included here, but the overall desired condition is to restore natural river processes. Park staff is very interested in sharing and exchanging data with the Quinault Nation in order to promote and enhance understanding of natural resources and shared issues.

Comment: The ONP needs to make it a high priority to relocate its portion of the Upper Hoh Road to outside of the channel migration zone.

Any modifications to the river need direct consultations with the Tribe. As a rule, the Tribe discourages additional impacts on the habitat for the Tribe's fishery resource. The Tribe favors removing long-term impacts to the fishery resource and potential impacts, such as roadways, out of the river channel migration zone to protect the resource long term.

The plan should include government-to-government consultation with the Nation prior to moving the Queets Road.

Response: The preferred alternative calls for the Park Service to work to relocate portions of the Hoh Road outside the active river channel/floodplain if feasible, and to work with tribes and county partners to maintain road access and provide other appropriate services (pages M32 and M40). Olympic National Park will continue to work and consult with Indian tribes on a government-to-government basis to address issues concerning Indian tribal self-government, trust resources, and Indian tribal treaty and other rights throughout the implementation process and in future planning efforts

Comment: The Tribe agreed to work collaboratively with park staff to assist them in soliciting certain funding support for the project and rebuilding the Staircase Rapids trail bridge. Park staff commented that unfortunately, fire suppression needs tend to outweigh this bridge reconstruction as the fiscal year ends. The Tribe believes if the bridge is part of the preferred alternative D, it should not be weighted against fire suppression, but treated as both a cultural and recreational enhancement

Response: We are unsure of the source of this information. Funding for fire suppression comes from an entirely separate funding source than that which would be used to address bridge replacement. Further, a construction project as large as replacement of the Staircase Rapids bridge would require more money than is available at "fiscal year end"; project money would need to be requested.

The park staff applied for storm damage funding in 2003 to repair facilities (including the Staircase Rapids Bridge) throughout the park that had been damaged from previous storms, but none was received. A proposal in the amount of \$425,000 was developed in 2005 to construct a replacement trail bridge at Staircase Rapids. It has been submitted through normal funding calls but has not yet been funded. We would be happy to work collaboratively with the tribe to pursue other sources and opportunities for funding.

Treaty Rights and Trust Resources

Comment: Only nontreaty fishing is regulated. Clarify that the treaty fishing in the rivers, lakes, and tidelands is not regulated by the park.

Response: We have clarified this in the *Final General Management Plan*.

Comments: The Park Service should recognize the Nation's treaty rights to fish, hunt and gather, and the trust responsibility.

One of the over arching issues that the tribe does have with the Park Service is that of the rights of tribal members to hunt, gather, and fish in the land of their forefathers.

Response: The Park Service recognizes the Quinault Nation's treaty rights to fish, hunt and gather as these rights have been legally defined. Further defining the application of tribal treaty rights is beyond the scope of the general management plan, and it is not our intent to diminish treaty rights or otherwise resolve unadjudicated treaty rights in this document. The Park Service is committed to pursuing opportunities to improve natural resource management within parks and across administrative boundaries by pursuing cooperative conservation with American Indian tribes in accordance with Executive Order 13352, "Facilitation of Cooperative Conservation"

and NPS *Management Policies 2006* (4.1.4). The Park Service reaffirms its policy concerning trust resources and will “interact directly with tribal governments regarding the potential impacts of proposed National Park Service activities on Indian Tribes and trust resources . . .” and “will ensure that effects on trust resources are explicitly identified and evaluated in consultation with potentially concerned tribes and that they are addressed in planning, decision, and operational documents.” (NPS *Management Policies 2006*, 1.11.3) The Park Service also recognizes case law that federal agencies must ensure that treaty reserved rights are not impaired or abrogated by the action of federal agencies. Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

Comment: The draft's extensive discussion avoids two treaty issues. The draft fails to state that the Federal Courts have also adjudicated the nature and extent of the Quinault right to hunt, albeit at a lower level than the fishing rights decision.

Response: The Park Service recognizes the Quinault Nation's treaty rights to fish, hunt, and gather as these rights have been legally defined. Further defining the application of tribal treaty rights is beyond the scope of the general management plan, and it is not our intent to diminish treaty rights or otherwise resolve unadjudicated treaty rights in this document. Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

Comment: The park service has a heightened duty and fiduciary obligation to not only acknowledge these treaty rights, but to take clear, meaningful steps to protect them through the plan. The Nation's interest must be elevated above those of the general public and the plan should explicitly state this. The balance must weigh in favor of resources protection (not access by the public) when treaty rights are implicated.

Response: We have updated the *Final General Management Plan* to include more specific language about area tribes and treaty rights (pages 211-214). We have added text about the relationship of the eight tribes to the park on page 14-17, have provided more information on pages 37-38, and have updated the language on pages 14-17 to include more information on the trust relationship between American Indian tribes and the federal

government. More specific language regarding the development of partnerships and agreements with area tribes and the park's commitment to work closely with the tribes to protect resources was added to page 54 in the final plan. We have updated the language under “Parkwide Policies and Desired Conditions - Exotic Species” to state that the National Park Service will work with tribes and neighboring land managers to control or eliminate exotic plants (Page 29 of the final plan).

Tribal interests and issues were taken into account in the *Draft General Management Plan* in terms of ecosystem management (page 16), fire management (page 17), water resources (page 18), marine resources (page 21), native species (page 23), rare, threatened and endangered species (page 25), cultural resources, including archeological sites and ethnographic resources (pages 28-32), and visitor use and experience (page 33).

As stated on pages 10 and 11, Olympic National Park is managed under several laws, including the National Park Service Organic Act, The National Park Service General Authorities Act, and the Olympic National Park establishing legislation. The first two laws establish the fundamental purpose of all parks, including providing for the enjoyment of park resources and values by the people of the United States (NPS *Management Policies 2006*, 1.4.3). In addition to the establishing legislation, there are other laws that apply to the park (see page 11). As stated previously, the National Park Service must also honor its legal responsibilities to American Indian tribes as required by the Constitution of the United States, treaties, statutes, and court decisions (NPS *Management Policies 2006*, 1.11).

The general management plan is not intended to diminish treaty rights or have any influence over the resolution of unadjudicated treaty rights.

Comment: Regarding “Usual and Accustomed Area” lands — Throughout the *Draft General Management Plan* the off-reservation right of the tribes is inadequately and sometimes erroneously described. Only on page 133 is the discussion adequate. There are numerous references prior to page 133 and no explanation of why these eight tribes should matter within park boundaries. On page 4 the drafter briefly discusses the tribe's relation to the lands in the park (add "water"). It is more than a relationship; it is shared ownership of the resources.

Response: We have added text to pages 14-17 in the final plan to clarify this information. The United States recognizes the right of Indian tribes to self-government and to exercise inherent sovereign powers over their members and territory. In accordance with Executive Order 13175 of November 6, 2000, the United States will continue to work with Indian tribes on a government-to-government basis to address issues concerning Indian self-government, tribal trust resources, and Indian tribal treaty and other rights.

In accordance with NPS *Management Policies 2006* (1.11), the National Park Service has a unique relationship with American Indian tribes, which is founded in law and strengthened by a shared commitment to stewardship of land and resources. The Park Service will honor its legal responsibilities to American Indian tribes as required by the Constitution of the United States, treaties, statutes, and court decisions.

The formal legal rationale for the relationship between the National Park Service and tribes is augmented by the historical, cultural, and spiritual relationships that American Indian tribes have with park lands and resources. Olympic National Park will pursue an open, collaborative relationship with the eight American Indian tribes to help tribes maintain their cultural and spiritual practices and enhance park staff understanding of the history and significance of sites and resources within the park.

Comment: Add to page 48: US v Winans language addressing treaty rights, and the rights of tribes to harvest fish on private lands as well as public ones throughout their “Usual and Accustomed Areas.” This right continues to this day and was never abrogated with the establishment of the park.

On page 48, the plan states that the National Park Service does not manage Indian assets and that overriding mandate is to manage the park consistent with park laws and regulations. This statement disregards the park's responsibility to protect Indian assets within the park.

The document does not discuss treaties in the same section as the laws (statutes) that govern the park and this should be addressed.

Response: The management of the national park system is guided by the Constitution, public laws, treaties, proclamations, executive orders, regulations, and directives of the secretary of the

interior and the assistant secretary for fish, wildlife and parks. National Park Service policy applies these authorities, including the Olympic National Park enabling legislation that states “nothing [herein] shall affect...the rights reserved by treaty to the Indians of any tribes.”

As stated on pages 10 and 11, Olympic National Park is managed under several laws, including the National Park Service Organic Act, the National Park Service General Authorities Act, and the Olympic National Park enabling legislation. The first two laws establish the fundamental purpose of all parks, including providing for the enjoyment of park resources and values by the people of the United States (NPS *Management Policies 2006*, 1.4.3). In addition to the park's enabling legislation, there are other laws that apply to the park (see page 11).

As stated previously, the National Park Service must also honor its legal responsibilities to American Indian tribes as required by the Constitution of the United States, treaties, statutes, and court decisions (NPS *Management Policies 2006*, 1.11). The information on treaties has been added to the final plan in Chapter 1 under “Regional Context” and also under “Federally Recognized Tribes.” Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

It is not the National Park Service's intent to expand or diminish those authorities in this general management plan. The general management plan is not intended to diminish treaty rights or have any influence over the resolution of unadjudicated treaty rights.

Comment: The plan must allow maximum flexibility for the Park Service to act in its role as trustee in protecting resources of particular interest to the nation. Nowhere in the alternatives evaluations does the *Draft General Management Plan* state how the Park Service considered tribal interests in seeking this balance (to allow for public access and protect natural resources).

Response: The National Park Service is committed to continuing and improving its working relationships with the eight tribes of the Olympic Peninsula and would be happy to work collaboratively with the tribes, including the Quinault Indian Nation, to establish restoration

goals and priorities for river systems and other resources within the park.

As noted previously in this Comment and Response section, several executive orders, and National Park Service *Management Policies 2006* (1.11) establish the direction for National Park Service and responsibilities to tribes; section 1.11.1 clearly explains the government-to-government relationship.

In developing this general management plan, the National Park Service sought tribal input throughout the planning process, beginning in 2001. Tribal input was requested about issues to be addressed in the plan and tribes were asked for information and feedback as the *Draft General Management Plan* was developed. As described on page 355, the Park Service requested to meet with all eight tribes to discuss the planning process; at least one meeting was held with each tribe. The National Park Service offered to hold formal government-to-government consultation meetings with all of the tribes to discuss *the Draft General Management Plan*; six of the tribes requested meetings.

Many issues were brought forth by the tribes. Some issues were considered within the scope of the general management plan (e.g. protection of cultural resources). Other issues were too detailed to be included in a general management plan or were outside the scope of the plan (e.g. selling crafts and tribal wares at park visitor centers). The Park Service is committed to working with the tribes to resolve those issues through other plans and agreements after finalization of the general management plan.

Throughout the planning process, the National Park Service reviewed laws, treaties, executive orders, and National Park Service policies (NPS *Management Policies 2006*, 1.11.3) which establish policy and direction for the protection of trust resources. The *General Management Plan* includes measures to protect park resources throughout the section on “Desired Conditions and Strategies.” Trust resources will also be protected within this framework. (See pages 19, 23, and 25). The desired conditions were established for overall resource protection and in consideration of the potential effects on trust resources. The strategies outlined in the *Draft General Management Plan* are not considered an all-inclusive list. We expect that additional strategies will be developed over time in collaboration with area tribes and other entities.

In addition, the National Park Service is willing to develop informal and formal agreements to work with the tribes to protect resources, similar to what occurred within the framework of the Elwha River Restoration Plan.

Comments: Makah Rights to Whale and Seal. The draft plan mentions that the Makah Tribe retains the treaty right for “whaling and sealing at usual and accustomed grounds and stations.” The nature and extent of the Makah right has not been [upheld in court]. To be complete, the draft plan should state that the nature and extent of the Makah right to whale and seal has not been adjudicated. Nor has there been any determination that all or portions of the Olympic National Park coastal strip are “usual and accustomed grounds and stations” in the meaning of the Treaty of Neah Bay.

The *General Management Plan / Environmental Impact Statement* should acknowledge that the Tribe’s whaling rights includes the right to use the shore for the purpose of landing and harvesting whales that become stranded on beaches within its usual and accustomed whaling area. The GMP states that whaling “was” an important activity for the Makah, but should also acknowledge the current importance of whaling to the Tribe.

Response: As stated in the *General Management Plan*, the Treaty of Neah Bay and the other treaties secured certain rights to the tribes in exchange for Indian cession of lands and waters that are now within the boundaries of Olympic National Park. The treaties were not a grant of rights to the Indians, but a grant of rights from them, and a reservation of those rights not granted (*United States v. State of Washington*, 384 F. Supp. 312 [1974]: 323). These reserved treaty rights were recognized and included in Section 4 of the bill to establish Olympic National Park (H.R. 4724) in 1938. The clause in Section 4 stipulates that “the rights reserved by treaty to the Indians of any tribe . . . shall not be affected by the establishment of the National Park.” The three peninsula treaties secured the rights of the eight tribes to take “fish at usual and accustomed grounds and stations . . . together with the privilege of hunting and gathering roots and berries on all open and unclaimed lands.” The treaty with the Makah also secured the right of “whaling and sealing at usual and accustomed grounds and stations.” The *Final General Management Plan* has been modified to state that whaling “is” an important activity for the Makah. The general management plan is not intended to diminish treaty rights or have any

influence over the resolution of unadjudicated treaty rights.

VEGETATION

Comment: An important omission is that plants with special status in the state are present in the park, could be impacted by park activities, but are not included in this analysis. We recommend that the analysis of effects include all species that are assigned special status by the Natural Heritage Program.

Response: We have updated the *Final General Management Plan* on page 184 and appendix G to include this information.

Impacts to vegetation, including special status species, is considered in the “Vegetation” section of the “Environmental Consequences” chapter in the *General Management Plan*. More detailed environmental analyses will occur after the final general management plan as site-specific plans and compliance are developed.

Comment: On page 110, native species are mentioned. Not until page 320 are invasive exotics discussed. In any discussion about what species are in the park, it is important to mention the invasive species and how they impact native ones.

Rivers are often the vectors of invasive species. More attention needs to be given to river management in terms of invasive species eradication.

Response: Desired conditions and strategies for managing exotic and invasive plant species are shown on page 24 of the *Draft General Management Plan*. In addition, action items to control or reduce the spread of exotic vegetation are listed as mitigation measures for Vegetation (page 76). The park staff is currently working to control invasive, exotic plants along many rivers, including the Quillayute, Dickey, Sol Duc, Hoh, Elwha, and Big Rivers. The park staff coordinates these activities with area tribes and adjacent property owners and land managers.

VISITOR USE

Access and Stock Use

See also, Wilderness

Comment: If your draft plan is adopted, future access to many varied users, including stock users, will be adversely affected. Zoning horses out [of primeval and primitive zones] means that there never will be the opportunity for horses to utilize these areas should trails be built or circumstances change, which leaves the only backcountry access open to stock a prescribed subset of trails in the Wilderness Trail zone.

Response: Zoning provides a means to define a range of management prescriptions that state the desired condition of resources, the visitor experience, and management facilities for specific areas within the park. The zone descriptions have been included in the final plan, however, the zoning designations within wilderness have been removed from the final plan and they will be included in the future wilderness management plan. It was felt that the *Draft General Management Plan* did not provide enough detailed information for readers to adequately analyze potential changes from current conditions.

Generally, within the wilderness, the wilderness trail zone would allow for greater human-caused impact, higher use levels, and more visitor facilities while the primitive and primeval zones would allow for less human-caused impact, lower use levels, and fewer visitor facilities (pgs 57-61). The wilderness trail zone is where stock use would be considered appropriate, while stock would be excluded from the more pristine primitive and primeval zones (pg 60).

There are no plans under the *Draft General Management Plan* to build additional trails in the wilderness. Under the plan (page 61), there will be a maintained trail system which will include nature, all purpose, multipurpose bicycle (frontcountry), secondary, foot, and primitive trails (these classes are defined in the glossary in the *Final General Management Plan*). All purpose, multipurpose bicycle, and secondary trails would be open to stock throughout the park.

Comment: I have seen that it is proposed that all stock camps above 3,500 feet are to be closed. This creates a crowding concern and safety concern for stock users. It could result in increased impacts in existing stock camps. The reality is there are only

three sites above 3,500 feet, but the closure will have a negative impact on stock use. Further clarification is needed about what appears to be a new policy governing specific use in wilderness without a careful and deliberate discussion and analysis of rationale.

Response: That information was removed from the final plan. However, the Olympic National Park “Superintendent’s Compendium” currently prohibits camping with stock outside designated stock camps above 3,500 feet. Only three stock camps have been designated above this elevation due to sensitivity of the subalpine/alpine vegetation. The final plan now states (page 72) under wilderness zone that “stock use would be allowed only on trails and may be restricted from some trails and sites.” This information will be further clarified in the wilderness management plan.

Comment: The Park Service should monitor and regulate stock use to minimize detrimental impacts in trails and prohibit grazing

Response: The park’s “Superintendent’s Compendium” currently includes provisions that address minimizing stock-related impacts, including grazing. Specific guidance related to future stock use within the wilderness will be developed in the more detailed wilderness management plan.

Comment: No apparent on-the-ground provisions are made to ensure that nonnative plants are not introduced to the park via stock use.

Response: Currently the Park Service prohibits the packing in of any stock feed that contains viable seed, and requires the use of certified weed-free supplemental food on overnight trips. The wilderness management plan, rather than the general management plan, will address more detailed wilderness management issues such as introduction of exotic plants.

Comment: How does the “Right to Ride” legislation affect the general management plan?

Response: The “Right to Ride Livestock on Federal Lands Act of 2005” was introduced in the House on February 2, 2005. On May 16, 2006 it passed and was agreed to in the House. On May 17, 2006 it was received in the Senate and referred to Senate Committee on Energy and Natural Resources where it is currently held. Its purpose is “to preserve the use and access of pack and saddle stock animals on

public lands, including wilderness areas, administered by the National Park Service, the Bureau of Land Management, the United States Fish and Wildlife Service, or the Forest Service where there is a historical tradition of the use of pack and saddle stock animals, and for other purposes.” While the bill has not yet passed, the intent of the general management plan is to continue to allow stock use within Olympic National Park.

Comment: In some areas where there is stock use there is no road access to the trailhead for stock vehicles (e.g. Dosewallips).

Response: Under the preferred alternative, roads might be modified or relocated for resource protection and/or to maintain vehicular access. Stock access will be considered during implementation planning. Currently, Dosewallips Road is closed due to a road washout on U.S. Forest Service administered lands. The U.S. Forest Service is working with the Federal Highway Administration and the National Park Service to restore vehicular access to the Dosewallips, including repairs on the National Park Service portion of the road at Dosewallips Falls. However, due to the grade of the roadway at the falls, it is unlikely that even after the repairs, that stock trailers will be permitted past that point.

Desired Conditions and Strategies

Comment: Add, “Designate quiet areas within campgrounds (similar to no smoking areas) to raise public awareness of the acoustic environment and to offer quieter camper experiences” to the desired conditions and strategies for visitor use and experiences. These quiet areas should be located in an area best suited for listening to nature, for example adjacent to a babbling brook or next to a cliff that reflects distant sounds.

Response: There are many places in park that are quiet. Developed areas are generally those areas accessed by road that visitors expect some level of human-generated noise. “Desired Conditions” include both the encouragement of visitors to minimize noise in campgrounds, and interpretation and education efforts about soundscapes and the value of protecting natural quiet and natural sounds. The designation of “quiet” zones in campgrounds is too detailed to include in the general management plan.

Comment: Under Visitor Use on page 33, one condition and/or strategy not fully discussed is how the general management plan will ensure access to all generations of park users.

The extension of wilderness and focus on additional wilderness experiences appears to be missing the growing demographic of “retiring baby boomers” touring the Nation’s park at a time in their lives where endurance hiking and recreating may no longer be physically possible or their primary objective.

Response: The parkwide policies for visitor use and experience (page 33) address a full range of park experiences, including frontcountry day use visitation, and providing the appropriate roads, trails and related facilities for visitor enjoyment. The National Park Service is mandated to provide, to the extent feasible, programs, services, and facilities in the park that are accessible to and useable by all people, including those with disabilities. The preferred alternative calls for the development of more universally accessible trails in the frontcountry portions of the park, and improvements to visitor facilities — increasing visitor experience opportunities and giving more people access to facilities and the spectrum of activities in the park (page 89).

Comment: Under "Visitor Use and Experience..." add “Develop educational materials that help publicize features of Olympic Park that are not widely recognized but significant (e.g., soundscape and natural quiet).”

Response: The draft plan identifies the desired condition that park visitors will have opportunities to understand and appreciate the significance of the park and its resources. Further, it identifies a strategy to accomplish this by providing a variety of educational opportunities (page 33).

Visitation Figures

Comment: Assumptions regarding increased visitor use could be better documented and analyzed. Concern: The Historical and Projected Visitor Use Chart, Figure 5, at page 173, assumes a single linear regression regarding use patterns from 1990 thru 2005, with a projection through 2009 based on the linear regression for this time period. The data actually shows a significant reduction in visitor use for 2003 and 2004, to levels recorded in the early

1990s. No data is shown for 2005. The time series data may not be linear and upward trending at all, and it is possible that visitor use may be even on the down turn, given the park's relative remoteness and the reliance on out-of-area visitors in automobiles to travel to the park. It is also hard to reconcile a projection only thru 2009 when this planning document is contemplated to serve a time-period of between 15 and 20 years. Second, Olympic National Park use is highly dependent on the seasonal weather — especially huge amounts of rain, and snow in the high country, as well as road and trail access throughout the park.

These constraints define the use season in many areas and for certain user types. Even year to year, use seems to vary depending on the weather, sometimes including the summer months.

Response: Recreation visits in 2005 were 3,142,774 and 2,749,197 in 2006 (our lowest annual recreational visitation statistic since 1993, possibly due to closures related to storm damage). We have provided an updated regression analysis in the final plan. This analysis shows that, while visitor use varies from year to year, the general trend over the years 1990-2005 is one of increasing use. The regression line can be extended simply by applying the regression formula and substituting the year (e.g. 2006) for the x-value. This analysis identifies the trend and does not specifically predict the amount of visitor use accurately for any one year.

Olympic National Park visitation is greatly influenced by seasonal conditions, weather, and other regional events. This is why we use our visitation statistics as trend indicators, rather than precise measurements of the numbers of visitors on any given day or month. We also recognize that our visitation has dipped in recent years, a phenomenon seen throughout the National Park Service. Like the rest of the National Park Service, we are working to invite and engage more people, especially young people and other under-represented groups.

Comment: Stating that “visitation is expected to continue to increase in proportion to regional population” seems naïve and unlikely to prove true over the general management plan's planning horizon.

There is no discussion or distinction regarding park use by local populations as compared to destination visitors (from distances greater than a half day of travel). This could have a significant impact on the

need for expanded campgrounds and other overnight facilities in the park or outside. The only way to reach the Olympic Peninsula is by car (or bus). If the cost of gas continues to rise over the long term, as expected, it may be that destination travelers will diminish over time, and thus the need for campgrounds in the park will remain static. The outcome of a more careful and thorough analysis of visitor use and utilization of existing facilities should reach conclusions regarding visitor use and how that might affect facilities requirements (For example, how often are the various individual campgrounds full on a seasonal basis or how difficult is it to get a back country permit for specific locations during high use periods?). With respect to data contained in several charts and narrative, how does one “visit Lake Crescent?” The lake, for its entire length, is flanked on the south by the only major roadway (US 101) from Port Angeles to Forks, and used by all kinds of vehicles, which may have no relationship to park visits.

Response: A visitor survey conducted in 2000, summarized on page 139, showed that 47% of visitors to Olympic National Park are from Washington State, but further details regarding visitors' home towns are not available. It is therefore reasonable to expect that Olympic's visitation will increase as the state and regional population increase.

Visits throughout the park are divided into “recreational” and “nonrecreational” visits, according to formulas developed through past visitor surveys and detailed traffic counts. At Lake Crescent, only a fraction of the total visitation is recorded as “recreational” in nature.

At Lake Crescent, a traffic counter is located along the westbound lane of Highway 101. The traffic count from the westbound lane is first multiplied by two to estimate the total number of vehicles traveling both eastbound and westbound. This total count is then multiplied by a “recreation proportion factor” to determine the number of vehicles traveling through the Lake Crescent area for recreational use. The recreation proportion multiplier varies according to season. For example, we estimate that 20% of vehicles traveling in winter are on recreational visits, while an estimated 80% of vehicles in August are making recreational visits. For more information on how Olympic visitation statistics are gathered, visit <http://www2.nature.nps.gov/stats/> and click on “Visitation” and “Counting Methods by Park.”

Comment: Cabins and full time residences apparently achieve “visit” status for each day occupied. I may be incorrect on these presumptions, but visit classification needs further clarification.

Response: Neither overnight use nor day use of residential properties within the park is classified as “visitation.” Overnight stays at park campgrounds and lodges are counted, along with wilderness overnight camping.

Comment: How many visitors go into the wilderness?

Response: The *Draft General Management Plan* included wilderness use numbers on page 121. We have data for overnight use only. In 2003, the overnight use levels in wilderness were approaching 94,500 visitor use nights. In 2006, there were 83,420 visitor use nights recorded for overnight wilderness use.

WATER RESOURCES

Comment: The Park Service may have missed an opportunity to discuss and collaborate on the development of instream flows, water quality, and water related habitat issues by not being able to participate in “WRIA 19” or “WRIA 20” planning efforts. The lack of National Park Service participation was specifically noted and raised on certain occasions as discussions involved the various rivers, as well as Lake Ozette, that originate and/or flow through National Park Service territory. In addition, because of the nature in which waterways originate in National Park Service uplands, flow through private and state lands, and discharge in estuaries in and adjacent to National Park Service shorelines, the National Park Service needs to further explain what role it plans to play in water quality issues with regard to the strategy of attaining “the highest possible water quality standards available under the Clean Water Act.”

Response: Park staff has participated intermittently in WRIA planning efforts since they began in the late 1990s by contributing data to these planning efforts, even if they were not present at every meeting. There are nine WRIA's that include or influence park areas and numerous meetings for each one, meaning that staff time and issues must be prioritized. Additionally, the park had only one

fisheries biologist until late 2005 and does not have a hydrologist. As available, park staff will continue to participate in the WRIA planning efforts.

Comment: The summer turbidity of the mainstem of the Hoh River is due to glacial melt releasing suspended particulate material and not only from channel changes and bank undercutting.

Response: The commenter is correct. The Hoh River is cloudy in the summer, even without bank erosion, due to the glacial influence.

Comment: On Table 5, Park Watersheds, *General Management Plan* page 103, we are confused as to why information was “not available” for this table regarding “Percent of Watershed in the Park.” In addition to various local sources, such information could easily be obtained from a simple GIS inquiry.

Response: This information has been updated on Table 7 in the final plan.

Comment: Hubert Glacier drains into the South Fork of the Hoh, yet this stream is classified as non-glacier.

Response: The commenter is correct. This information has been updated on Table 7 in the final plan.

Comment: Ozette River is a drainage river, not a spawning river.

Response: The Ozette River is primarily a drainage river but there is spawning. The majority of the spawning happens upstream from the lake, or in the lake, but fish also spawn in the lower river.

WILD AND SCENIC RIVERS

Comments: All rivers should be considered for wild and scenic river designation

We specifically recommend that the general management plan include an inventory of the eligibility of all major river systems for inclusion into the wild and scenic rivers system and provides protection of natural river processes and critical fish and wildlife habitat.

Under the Wild and Scenic Rivers Act, all federal land management agencies, including the National Park Service, are required in their planning process

to study rivers for eligibility in the national system. Also see *NPS Management Policies 2006* (2.3.2.10)

Response: The National Park Service protects, recognizes, manages, and conserves rivers in a variety of ways. One way is through the Wild and Scenic Rivers Act. In 1989, the National Park Service conducted a preliminary analysis of rivers within Olympic National Park and determined whether they had the characteristics necessary for wild and scenic river designation. Thirteen rivers were determined to be eligible (as listed on page 51 of the *Draft General Management Plan*). According to National Park Service policy, general management plans and other plans may not propose actions that could adversely affect the values that qualify a river for the national wild and scenic rivers system. A determination of eligibility does not require a formal study, nor does it require the National Park Service to seek designation. If a positive determination of eligibility is found, the agency is required to manage the river so as to not diminish the resources and values that caused its eligibility in the first place. If a park manager decides to move forward with a formal study, the study can be done in conjunction with a general management plan, a general management plan amendment, or in a separate NEPA planning process.

Rivers within Olympic National Park were previously evaluated for wild and scenic river eligibility in 1989 as stated on page 51 of the *General Management Plan*. Thirteen rivers were considered eligible. The next step will be to conduct formal suitability studies and associated planning. This information is included on page 81, and has been updated to reflect current National Park Service policies.

Within the general management plan process, Olympic National Park reviewed the existing eligibility studies and determined that formal suitability studies related to wild and scenic rivers designation will be conducted in a separate NEPA planning process after the general management plan is completed (see page 51), due to the high number of rivers involved and the detail needed for these studies. These studies will have added additional volumes to the *General Management Plan*, and added additional time to complete these studies, delaying the completion of the plan, and increasing its size to the point of making the document difficult to use (unwieldy) by many of the public.

Upon completion of the *Final General Management Plan*, formal requests will be made for funding to conduct the suitability studies and associated studies, understanding that a wilderness management plan is the park's next planning priority.

WILDERNESS

Comment: A major concern is that visitor experience is stated as the primary purpose of the park, superseding protection of natural resources and wilderness. The Wilderness Act should be cited (page 33) as one of the laws, regulations, and guidelines that the National Park Service is to follow.

Response: Actually this is not the case. The "fundamental purpose" of the national park system, established by the Organic Act, is to conserve park resources and values, and provide for the enjoyment of those resources and values. The purpose of the park is guided by the enabling legislation, as stated on page 9 of the *Draft General Management Plan*; it is also guided by other laws and legislation. The National Park Service is required to determine the balance between visitor use and resource and wilderness protection. According to NPS *Management Policies 2006*, when there is a conflict between the two, conservation is to be predominant (1.4.3).

Specific laws and policies for wilderness, including the Wilderness Act, are included on page 11 under "Laws, Regulations and Servicewide Mandates and Policies" and in the table on page 26, under "Desired Conditions Based on Servicewide Mandates and Policies." The Wilderness Act is also cited on page 117 under the "Wilderness Values" section of the "Affected Environment" chapter. We have updated chapter 1 to include the Washington Wilderness Act of 1988 to the "Laws, Regulations, and Servicewide Mandates and Policies" section.

Comment: I believe today, nationally, there are presently 106 million acres of designated wilderness areas. When President Johnson signed the law there was 9.2 million acres.

Response: When the Wilderness Act was passed in 1964, 54 areas (9.1 million acres) were designated as Wilderness. The National Wilderness Preservation System, as of February 28, 2007, now includes 107,436,642 acres in 702 areas. Source: <<http://www.wilderness.net>>

Cultural Resources, Cultural Landscapes

Comment: There is no support for maintaining "historic feeling and appearance" of [cultural] landscape in wilderness.

Response: There is support for maintaining cultural landscapes within the park (see page 52 of this volume). Laws pertaining to historic preservation remain applicable in wilderness but must generally be administered to preserve the area's wilderness character (NPS *Management Policies 2006*, 6.3.8).

As stated on page 30 of the *Draft General Management Plan*, in accordance with NPS *Management Policies 2006* (5.1.3.1), the National Park Service will complete a cultural landscape inventory to identify landscapes potentially eligible for listing in the national register and to assist in future management decisions for landscapes and associated resources. For landscapes listed or determined to be eligible for listing in the national register, decisions regarding which treatments will be undertaken will be reached through the planning and compliance process.

The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analysis and decision making concerning cultural resources, including cultural landscapes in wilderness.

Cultural Resources, Historic Structures in Wilderness

Comment: New or old, the Wilderness Act does not allow maintaining structures in wilderness unless they are the minimum necessary for administration of wilderness. The structures identified in the *Draft General Management Plan* do not meet that test.

Response: The National Park Service agrees that structures necessary for the administration of wilderness may be maintained, but disagrees with the statement that the Wilderness Act does not allow maintaining other structures.

As noted above, and as reflected in the recent case law and policy, historic preservation of structures may be allowed if the decision maker reasonably concludes that historic preservation activity will preserve the area's wilderness character and values, using management methods that are consistent with preserving wilderness character and values.

NPS *Management Policies 2006* states that cultural resources that have been included within wilderness will be protected and maintained according to pertinent laws and policies governing cultural resources using management methods that are consistent with the preservation of wilderness character and values (6.3.8).

Comment: Question the use of 16 U.S.C. 1133(a)(3) as basis for placing all cultural resources programs above preservation of wilderness character (re: 1970 Administrative Policies of the National Park Service, p. 55).

Response: The plan has been modified to further clarify law and policy. Laws pertaining to historic preservation remain applicable within wilderness, but must generally be administered to preserve the area's wilderness character. 16 USC 1133(a) (3).

Comment: National Park Service needs to acknowledge in the *Draft General Management Plan* how the Federal court decision in *Olympic Park Associates v. Mainella* affects wilderness management.

Response: The *Olympic Park Associates v. Mainella* decision allowed management of cultural resources in wilderness but only insofar as to also preserve Olympic National Park's wilderness character. This paradigm is now reflected in NPS *Management Policies 2006*, and changes to the *Final General Management Plan* have been made to reflect this holding and the recently revised National Park Service policy.

Comments: A recent court decision clearly mandated that wilderness be afforded a higher legal priority than historic preservation. In blatant disregard of that ruling, the draft plan proposed to repair/preserve dozens of structures and cultural sites. See also PEER letter.

Alternative D envisions repairing or reconstructing dozens of deteriorated, old cabins and shelters in the wilderness areas, mostly remnants of activities before the park was established.

Response: The holding in *Olympic Park Associates v. Mainella* has not been ignored. The *Draft General Management Plan* does not contemplate the construction and airlifting of any replacement historic structures. The National Park Service *Management Policies 2006* address this directly: "No matter how well conceived or executed, reconstructions are contemporary interpretations

of the past rather than authentic survivals from it." (5.3.5.4.4. Reconstruction of Missing Structures). The National Park Service will not reconstruct missing structures unless a host of criteria are met including approval by the Director.

Maintenance of historic resources is not precluded by *Olympic Park Associates v. Mainella*. The lesson of *Olympic Park Associates v. Mainella* is that cultural resource management activities must be informed by the status of the land as wilderness. This does not mean a historic feature must be allowed to decay. It does mean that cultural resources inside Olympic National Park wilderness will be managed using methods that are consistent with the preservation of wilderness character and values. Olympic National Park acknowledges that wilderness designation requires "a different perspective on the land" and is committed to balanced stewardship of cultural resources in a wilderness setting.

The *Draft General Management Plan* has been modified to more clearly reflect the evolving state of law in this area, and NPS *Management Policies 2006* (6.3.8) has been added to page 31 of the final plan reflecting this evolution. Laws pertaining to historic preservation remain applicable within wilderness but must generally be administered to preserve the area's wilderness character. 16 USC 1133(a) (3). The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analyses and decision making concerning cultural resources, including appropriate environmental compliance with opportunities for public involvement.

Comment: A federal judge rebuked Superintendent Laitner and Regional Director Jarvis for degrading wilderness character for the sake of preserving the historic scene, by attempting to install two new structures.

Response: National Park Service officials in consultation with others applied the Wilderness Act's savings clause to "save" or retain the National Park Service authority under the National Historic Preservation Act. The June 28, 2006 determination of legal fees from the U.S. District Court in *Olympic Park Associates v. Mainella* stated that: "[t]his case brought into conflict the values of historic preservation and wilderness preservation, which was a matter of first impression and one that created difficult questions. The United States reasonably attempted to harmonize the competing interests and legal authorities. The task was not an easy one.

The United States was reasonably justified in its position...”

Comment: In the 2005 decision, the court pointed out that the National Historic Preservation Act does not require physical maintenance and retention of historic structures; it only requires that the historical value of such structures be recorded. Olympic National Park was classified as a national park, not as a national historic site. And, as the 2005 court ruling notes, the wilderness classification places an additional new overlay on the landscape and the values that National Park Service is obligated to preserve at Olympic National Park and Wilderness. Old pioneer structures and “historic landscapes” are not on an equal footing in terms of National Park Service’ statutory obligations at Olympic National Park, and have no primacy over National Park Service’ obligation to preserve the natural environment and wilderness character of the area.

Response: The position of the National Park Service was not that the National Historic Preservation Act “required” maintenance and retention of historic structures, but that the National Historic Preservation Act “authorized” activities. The plan has been modified to reflect recent case law and new National Park Service policy that historic preservation decisions in wilderness areas are to affirmatively consider the preservation of the area’s wilderness character, as stated in *NPS Management Policies 2006* (6.3.8).

Comment: *The General Management Plan* takes the extreme position that cultural resource programs automatically trump wilderness mandates. The *General Management Plan* only allows that when the National Park Service carries out the cultural resource program, the National Park Service will use “methods that are consistent with the preservation of wilderness character...” (Page 26). But the *General Management Plan* presumes that the cultural resource program itself takes precedence over wilderness character.

Response: *The Draft General Management Plan* and National Park Service policy do not place the management of cultural resources above the preservation of wilderness character. Consistent with the intent of the Wilderness Act, and in accordance with *NPS Management Policies 2006*, the laws pertaining to historic preservation also remain applicable within wilderness but must generally be administered to preserve the area’s wilderness

character. 16 USC 1133(a)(3). The final plan has been modified on pages 31-32, 52-53, 147, 149, and 196 to reflect the language in *NPS Management Policies 2006* (6.3.8).

Cultural resources that have been included within wilderness will be protected and maintained according to the pertinent laws and policies governing cultural resources and wilderness, using management methods that are consistent with the preservation of wilderness character and values. The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analyses and decision making concerning cultural resources.

Comment: For the *General Management Plan* to decree that some fifty structures and eight “historic landscapes” will be maintained in wilderness in a forthcoming wilderness management plan without addressing necessity (under the Wilderness Act) of their impacts on wilderness character, is contrary to the Wilderness Act, National Park Service policies, and the scope of this plan.

Response: Laws pertaining to historic preservation remain applicable in wilderness but must generally be administered to preserve the area’s wilderness character (*NPS Management Policies 2006*, 6.3.8). The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analysis and decision making concerning cultural resources.

The methods and assumptions for the analysis of wilderness values were detailed on pages 189-190 of the *Draft General Management Plan*. As stated in the plan, the analyses in the *Draft General Management Plan* of the potential effects on wilderness resources included wilderness resource values that are considered a component of the wilderness character, including naturalness, wilderness experiences and opportunities for solitude, and opportunities for primitive, unconfined recreation. The methods and assumptions were generated after consultations with wilderness specialists from Olympic National Park, Denver Service Center, Pacific West Regional Office and the Washington Office, along with NEPA experts. Other wilderness resources, such as soundscape, visitor access, and natural resources were evaluated separately in the *Draft General Management Plan*. Generally, the impacts on wilderness character can only be subjectively determined by the visitor’s experience,

which varies greatly depending on the type of visitor and their expectations.

The Park Service included an adequate analysis of the impacts to wilderness values, including wilderness character, on pages 210-212, 247-249, 285-288, and 322-324. As stated on page 177, because the *Draft General Management Plan* is a programmatic document that does not delve into specific management techniques or methods, the level of analyses are more general in nature. If and when specific developments or other actions are proposed subsequent to the *Draft General Management Plan*, appropriate detailed environmental and cultural compliance documentation will be prepared in accord with NEPA and National Historic Preservation Act requirements, considering applicable laws and policies, including the Wilderness Act.

Comment: PEER does not advocate the removal of historical structures from Olympic wilderness; PEER does not advocate that the National Park Service cease maintenance or preservation of existing structures. PEER advocates that the *General Management Plan* make clear that the National Park Service will not develop, and thus destroy, the historic state of such structures in wilderness. Such an action would contravene the Wilderness Act. Note as well, that some of the historic structures in wilderness (ranger stations, fire lookouts, etc.) are National Park Service administrative facilities that may also be justified not only by their historical worth but as necessary for administration of the wilderness area.

Response: The National Park Service is in general agreement with these statements. We have updated our language on pages 31, 32, and 35 in the final plan to clarify these points.

Comment: All statements concerning historic and cultural resources in wilderness should be deleted from the current document and substitute instead the statement: "Historic and cultural resources within wilderness will be administered in keeping with the park's approved cultural resources management program and the additional requirements of the Wilderness Act."

Response: The final plan has been modified on pages 31-32, 52-53, 147, 149, and 196 to more clearly reflect law and policy. Laws pertaining to historic preservation remain applicable within

wilderness but must generally be administered to preserve the area's wilderness character.

Comment: The *Draft General Management Plan* does not argue for shelters as administratively necessary for protecting park wilderness. The *Draft General Management Plan* lists "shelters" among the "historic properties in the park" (p. 118). As "historic structures," shelters may remain in wilderness and the National Park Service may maintain them.

Response: Existing shelters are considered "historic" because they have been evaluated using the National Register of Historic Places "Criteria for Evaluation" (36 CFR 60.4) and meet this criteria. Twenty-two shelters are included on the List of Classified Structures and are either listed in or eligible for listing in the National Register of Historic Places. One shelter (Toleak) was determined ineligible but will be managed as a resource. Appendix E has been updated to reflect the most current information at the time of publication of the *Final Environmental Impact Statement*.

As stated previously, cultural resources that have been included within wilderness will be protected and maintained according to the pertinent laws and policies governing cultural resources and wilderness, using management methods that are consistent with the preservation of wilderness character and values. The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analyses and decision-making concerning cultural resources (NPS *Management Policies 2006*, 6.3.8).

Comment: There are reasons to maintain the trail system and historic structures. They are historic resources and should be preserved.

Response: Laws pertaining to historic preservation remain applicable in wilderness but must generally be administered to preserve the area's wilderness character (NPS *Management Policies 2006*, 6.3.8). The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analysis and decision making concerning cultural resources.

Desired Conditions in Wilderness

Comment: Under “Wilderness” add, “work closely with natural soundscape and natural quiet management.”

Response: This list is not all inclusive and through the development of the wilderness management plan, additional strategies will be included.

Comments: Under “Wilderness” and “Desired Conditions” add “absence of noise intrusions from overhead aircraft” and “aural solitude/natural quiet” to list of characteristics.

Also add, “prohibit helicopter flights at any altitude inside wilderness areas unless no other method of travel or mode of observation is possible.”

Response: Section 6(c) of the Wilderness Act prohibits the use of motorized equipment or motorboats, and no landing of aircraft unless it is necessary to meet minimum requirements for the administration of the area for the purpose of the Wilderness Act. In addition, NPS *Management Policies 2006* (6.3.5) directs that administrative use of motorized equipment or mechanical transport will be authorized only if it is the minimum requirement needed by management to achieve the purposes of the area as wilderness, including the preservation of wilderness character and values; or in emergency situations involving the health or safety of persons within the area. Current wilderness regulations and policies for use of minimum tool apply to all activities within wilderness. The *Draft General Management Plan*, page 77-78 addresses this, along with desired conditions on page 26.

Environmental Consequences in Wilderness

Comment: Impacts on wilderness character must be fully explored.

Response: Impacts on the wilderness character are fully explored in the *Draft General Management Plan*. On pages 189 to 190, the methodology and assumptions for impact analysis for wilderness values is detailed. These definitions were developed by wilderness and compliance specialists at the park, region, Denver Service Center, and Washington Office levels.

The Park Service included an adequate analysis of the impacts to wilderness values, including

wilderness character, on pages 210-212, 247-249, 285-288, and 322-324. As stated on page 177, because the *Draft General Management Plan* is a programmatic document that does not delve into specific management techniques or methods, the level of analyses is more general in nature. If and when specific developments or other actions are proposed subsequent to the *Draft General Management Plan*, appropriate detailed environmental and cultural compliance documentation will be prepared in accord with NEPA and NHPA requirements, considering applicable laws and policies, including the Wilderness Act.

Future Implementation Plans — Wilderness Management Plan

Comments: Defer all decisions related to wilderness until a comprehensive wilderness management plan is completed and available for public review

The *General Management Plan* seems to be attempting to make up for the park’s lack of wilderness management plan by frontloading several controversial decisions that deserve full discussion of rationale and impacts in the current plan.

Response: NPS *Management Policies 2006* (2.2 and 2.3) outlines that a logical, trackable rationale for park decisions is to be created through several levels of planning that are complementary and increasingly detailed. The basic foundational level is general management planning; the general management plan presents the first phase of tiered planning and decision making (see *Draft General Management Plan*, pgs 3 and 4). Implementation planning represents another tier, addressing more detailed management. A wilderness management plan is an example of an implementation plan.

The general management plan establishes the foundation for the wilderness management plan by setting the general framework for park wilderness management and providing the guide for the more detailed wilderness planning to follow in the wilderness management plan.

Decisions are made in the *General Management Plan* related to overall policies and mandates, desired conditions, and some initial strategies for wilderness (page 26-27). It also establishes basic

zoning in wilderness and may address more complex wilderness issues. This is all in accordance with National Park Service policies and planning guidelines (DO-2). Olympic National Park's wilderness management plan will be built on and initiated after the general management plan is complete and will guide preservation, management, and use of wilderness resources.

Comment: On page 26, the *General Management Plan* states that park staff will develop a wilderness management plan, but on pages 37-39 where there is a discussion of planning efforts and planning documents there is no mention of developing a wilderness management plan. When would this plan be initiated?

Response: Preparation of a wilderness management plan is discussed on page 81 of the *Draft General Management Plan*, under "Future Studies and Implementation Plans Needed." The wilderness management plan will be initiated after completion of the *Final General Management Plan*.

"Relationship of Other Planning Efforts to this General Management Plan" (pgs 37-39) includes approved plans that influenced the general management plan's preparation. The wilderness management plan is not mentioned here, as it is not as yet developed.

Comments: No wilderness management plan was completed, yet numerous controversial decisions about wilderness, such as maintaining and restoring between 29 and 50 historic structures in designated wilderness, are included.

No significant management actions affecting cultural resources within wilderness, except those needed in emergency situations, should be conducted until the Park Service has completed both the approved cultural resource plan and a comprehensive wilderness stewardship plan to ensure the proper coordination, consistency, and continuity of these two important programs.

Response: As stated on page 81 of the *Draft General Management Plan*, the Park Service agrees that the preparation of a wilderness management plan is a top priority for the park after completion of the general management plan. The wilderness plan will address the historic preservation of cultural resources in wilderness and will provide more details on how cultural resources will be managed. The National Park Service does not agree that no

significant management actions affecting cultural resources within wilderness will be taken until a wilderness plan is completed, but the National Park Service will be adhering to new law and policy in any decisions that are made in the interim. Laws pertaining to historic preservation remain applicable in wilderness but must generally be administered to preserve the area's wilderness character (NPS *Management Policies 2006*, 6.3.8). The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analysis and decision making concerning cultural resources.

In accordance with NPS *Management Policies 2006* (6.3.5), all management decisions affecting wilderness will be consistent with the minimum requirements concept. This concept is a documented process used to determine if actions undertaken by the National Park Service that could affect wilderness character, resources, or the visitor experience are necessary, and if so, how to minimize impacts. This process ensures the proper coordination, consistency, and continuity of wilderness and cultural resources management until a wilderness management plan is developed. As stated on page 81, a wilderness management plan will be initiated after the completion of the final general management plan to address the specific management strategies for Olympic National Park wilderness.

Potential Wilderness Areas

Comment: The plan should address the status of potential wilderness areas.

Response: The historic Olympic Hot Springs campground is a potential wilderness addition, and alternatives are included in the *Draft General Management Plan* for addressing the area (pages M9-12). The wilderness management plan will address the remaining potential wilderness additions, identifying the current nonconforming uses and, in areas where action might be taken to restore wilderness, developing general proposals.

Eligibility Studies and Wilderness Additions

Comment: Include Pyramid Peak Ridge wilderness suitability study in the preferred alternative.

Response: Page M16, the Lake Crescent alternative D, the preferred alternative, does include a wilderness eligibility study for this area.

Comment: The controversy over maintaining historic trail shelters and controlled burn at Lake Ozette is evidence that adding more wilderness areas is counterproductive. Adding wilderness areas to the park diminishes the historical areas and public access while merely increasing the size of the park.

Response: National Park Service policy calls for the balanced approach to managing historic properties in wilderness. Following this policy should provide full protection for cultural resources within a wilderness.

Cultural resources that have been included within wilderness will be protected and maintained according to the pertinent laws and policies governing cultural resources using management methods that are consistent with the preservation of wilderness character and values.

Comment: How can an area be considered wilderness-compatible when there are permanent structures in place?

Response: The Wilderness Act defines wilderness as “undeveloped federal land retaining its primeval character and influence, without permanent improvements.” Section 6(c) of the Wilderness Act prohibits structures or installations within wilderness, unless they are necessary to meet minimum requirements for the administration of the area for the purpose of the Wilderness Act. NPS *Management Policies 2006* (6.3.10) interprets this to mean that authorization of administrative facilities located in wilderness are to be limited to the types and minimum number essential to meet the minimum requirements for the administration of the wilderness area.

Comments: Why are Ozette Lake and the Ozette area the only wilderness studies being considered? Have all other nonwilderness areas of Olympic National Park received this assessment?

Why is a wilderness suitability study proposed for Lake Ozette?

Response: All lands (and waters) acquired after July 1974 need to be evaluated for wilderness eligibility in accordance with NPS *Management Policies 2006*

(6.2.1). In addition, lands not previously evaluated, such as the area north of Lake Crescent, need to be evaluated.

National Park Service *Management Policies 2006* (6.2.1) also states that where a nonconforming use has been terminated or removed, a reevaluation of eligibility must be conducted. In 1974, the now closed portion of the Boulder Creek road was deemed not suitable for wilderness because it was a road. Given its subsequent closure to vehicles and its proposed restoration, it will need to be reevaluated for wilderness eligibility. The text has been updated in the final plan under “Alternatives” to reflect this policy.

Comment: Much of the land within the proposed boundary adjustment of 12,000 acres in the proposed boundary adjustment at Lake Ozette has already been cut and continues to be clear-cut and would thus be inappropriate for wilderness designation.

Response: Lands may be currently ineligible for wilderness designation, but if boundaries were adjusted, active restoration will occur and over time, the lands could eventually be eligible for wilderness designation. In accordance with NPS *Management Policies 2006*, all newly acquired lands or lands not previously evaluated are to be evaluated for wilderness eligibility (6.2.1).

Comment: The “wilderness mandate” of Olympic National Park will eliminate active fish and wildlife habitat and water quality activities that are now and will continue to be done under the State of Washington legislation. The Olympic National Park preservation ethic conflicts with the Society of American Foresters conservation ethic and restricts our ability to ensure the continued health and use of the forest ecosystem

Response: The commenter is incorrect. The goal of the Park Service under the resultant boundary adjustment is to create an area of protection around the lakeshore that is not suitable for forest land manipulation and harvest management practices. It will not preclude the Park Service from implementing fisheries or other restoration projects.

If Ozette Lake or any lands acquired through the willing seller process are determined eligible for wilderness designation, and if legislation subsequently designates wilderness, management

activities will be required to follow the minimum requirement concept, but restoration and fisheries protection activities will not be precluded.

Comment: Will the intent of the administrative section (3) of the 1988 legislation be applied to any intended wilderness designation (refers to buffers). How will the National Park Service manage and take care of landowner needs if the wilderness designation comes up to the doorsteps of the landowner?

Response: The administrative section (b)(3) referenced by the commenter, referring to protective perimeters or buffer zones adjacent to wilderness, appears in H.R. 4146. It is not in the final language of Public Law 100-668, the Washington Park Wilderness Act of 1988, and therefore is not legally applicable to current or future lands adjacent to the Olympic Wilderness. NPS *Management Policies 2006* (6.3.4.1) states that "Transition zones adjacent to wilderness may be identified to help protect wilderness values, but no transitional or "buffer" zones are appropriate within wilderness boundaries."

Federal law generally provides for landowner access to property, including those instances when wilderness is immediately adjacent to private lands. All valid existing private rights remain with wilderness designation. National Park Service *Management Policies 2006* (6.4.6) reaffirms this: "Wilderness designation does not extinguish valid existing private rights. Valid private rights in wilderness are to be administered in keeping with the specific conditions and requirements of the valid right." This information has been clarified in the final plan and alternative D has been modified to reflect access rights.

Comment: Will the wilderness assessment study of the lake satisfy the implied need once and for all, or will we continue to be plagued by this type of assessment for years to come?

Response: National Park Service *Management Policies 2006* (6.2.1) state that lands originally assessed as ineligible for wilderness because of nonconforming or incompatible uses must be reevaluated if the nonconforming uses no longer exist.

Comment: The land north of the Spruce Railroad Trail in no way qualifies for wilderness designation. There are roads, private homes, and a resort in

addition to recreational activities north of the Spruce trail in the Lyre River area cove.

Response: The area proposed to be studied for wilderness eligibility does not include the trail or the lakeshore, or the Lyre River area cove.

Trails and Wilderness

Comment: No new trails have been created in years. Why isn't more money allocated for trails?

Response: In recent years, trail-related funding has been directed towards maintaining and repairing the existing 600 miles of trails within the park.

The *Draft General Management Plan* examined the question, "To what extent can there be public road and trail access to visitor destinations while minimizing or mitigating impacts on natural processes or park resources?" (page 41.) Several alternatives were considered within the plan and alternative C included increasing the number of trails (page 67). Under the preferred alternative (page 68) trails will be kept at approximately their current levels. Some frontcountry trails will be modified for universal accessibility.

Comment: Keep wilderness trails narrow; minimize construction and relocation of wilderness trails except where needed to protect resources. Maintain existing trail bridges and boardwalks

Response: Desired Conditions for the park (pg 33) state that "Roads, trails and related facilities are provided, but locations and numbers may be modified for resource protection, restoration, visitor experience, or increased visitation." Under the preferred alternative trails are kept at approximately their current levels (page 68) but might be modified for resource protection, restoration, or visitor experience, or to address increased visitation.

More detailed discussion of wilderness trails will be included in the wilderness management plan, to be initiated after the completion of this general management plan.

Comment: How would the trails change within the general management plan?

Response: The general management plan provides the framework to establish what trail types will be

found in each wilderness zone and does not change the trail status from current conditions.

Through the public involvement activities of the wilderness management plan process we will seek input on where wilderness zones should be designated and what trail classification should be assigned to all park trails.

Comment: Let's call all trails "trails," not "paths" and "routes" when you are meaning to suggest that they are sketchy or undesirable. The term "social trail" is okay. A "way trail" is a trail caused by people going the same way over and over again, with no particular plan. It is the opposite of an engineered trail, one that was laid out and built rationally. Don't call it a "way trail" if it is an engineered trail that has not been maintained.

Response: The *Draft General Management Plan* glossary (pg 392) includes definitions for the park's maintained trail types: Nature Trails, All Purpose Trails, Multipurpose Bicycle Trails, Secondary Trails, Foot Trails, and Primitive Trails. Travel routes that are recognized but are not a part of the maintained trail system include Way Trails, Social Trails, Routes, and Beach Routes/Travelways. Definitions for these types of trails have been added to the glossary.

Visitor Use and Wilderness

Comment: What is the social carrying capacity of certain areas of the park and what must be done to enhance or maintain the "wilderness" park experience? The *General Management Plan* avoids any quantitative discussion of "carrying capacity" or "user capacity," a method of attempting to quantify or qualify the impacts of overuse of a resource. In the context of the "wilderness character" of the park, there should be detailed discussion of the effects of overcrowding by visitors and the effects on the wilderness experience.

Response: This level of detail will be included in the wilderness management plan, which will be initiated following the completion of the general management plan.

Comment: It is unclear if backpacking would be allowed to continue in the coastal strip of the park.

Response: Backpacking will continue to be permitted on the coastal strip of Olympic National

Park (Table 2 of the final plan). However, overnight camping may be limited in certain areas, such as within the intertidal reserve zones. More detailed information on wilderness use on the coast of the park will be included in the wilderness management plan, to be initiated after the completion of this general management plan.

Comment: Establish quotas in certain backpacking areas (Sand Point, Seven Lakes Basin, Flap Jack Lakes for example).

Response: Overnight use limits or quotas are already in effect in a number of the park's wilderness camping areas, as specified in the "Superintendent's Compendium."

More detailed planning for the management of wilderness use will be included in the wilderness management plan, which will be initiated after the completion of this general management plan.

Comment: Page M12 notes that the "former historic Civilian Conservation Corps campground at Olympic Hot Springs would be rehabilitated with some sites removed." We are concerned that the removal of camping sites within that historic property would reduce access to campers, while also altering a historic property that the *General Management Plan* indicates the National Park Service wants to protect.

Response: The commenter correctly notes that the *Draft General Management Plan* preferred alternative calls for some sites at the former Civilian Conservation Corps campground to be removed and restored to natural conditions. However, this alternative further notes that "other sites would be retained to allow continued camping opportunities for backpackers" (page M12).

Park staff will work with the State Historic Preservation Office as required to ensure that campsite removal and restoration will not affect the historic integrity of the campground.

Wilderness Zoning

Comments: Why are there three wilderness zones in the *General Management Plan*? As far as I can read, there is only one Wilderness Act and that is the only one you should be following.

We strongly object to the proposal to designate use levels of wilderness areas without providing specific reasons.

A 1938 speech that wilderness preservation is primary management objective supports the need to limit or eliminate air tours and ask the Federal Aviation Administration to designate Olympic National Park a no-flight zone to all aircraft for the purposes of natural quiet preservation as key component of Olympic Park's backcountry wilderness.

To zone the Olympic Wilderness into use zones, including some 500 miles of trails, campgrounds, primitive trails, and cross-country routes, without providing any detail or specific rationale is clearly beyond the scope of the present plan.

The management zone concept on page 57 describes 3 wilderness zones. This is unnecessary. Wilderness is wilderness. The attempt to classify this into the wilderness trail zone, primitive wilderness zone and primeval wilderness zone appears to be a veiled attempt to administratively change the definition of wilderness as defined in the federal act with the intention of gradually making the backcountry less available to the public. The subsequent use of wilderness zones in the various alternatives to restrict public access is in direct opposition to the purpose and mission of Olympic National Park. It also is in conflict with the 1938 Olympic National Park enabling language.

Response: National Park Service *Management Policies 2006* (2.3.1.3) directs that a park's general management plan will include delineation of management zones. The management zones reflect differences in intended resource conditions, visitor experience, and management activity for specific areas of the park (pages 57-61). National Park Service *Management Policies 2006* (6.3.4.1) states that all categories of wilderness may be zoned for visitor experiences and resource conditions consistent with their wilderness values within the established management zoning system for each park. However, management zoning "cannot, and will not, diminish or reduce the maximum protection to be afforded lands with wilderness values."

Three wilderness zones have been proposed in the *Draft General Management Plan* to reflect a range in desired conditions for the wilderness, allowing higher levels of use and impact in some areas and

lower levels of use and impact in others. Each zone meets the spirit of the Wilderness Act, the 1988 Washington Park Wilderness Act, minimum tool requirements, and other applicable laws, policies, and guidance.

The wilderness zones proposed within the *General Management Plan* allow the Park Service to define long-term management options in the wilderness. For example, in the primeval zone, there would be no managed trails, no or few visitor services, and no designated campgrounds (Table 2 of the final plan). These zones provide the foundation for the development of the wilderness management plan. Specific designations of zones and, potentially, subzones, would occur within the framework of the wilderness management plan.

Comment: Buffer zones of 100-200 feet between roads and wilderness should be more aptly called visual buffer zone. This short distance does little to attenuate noise levels that intrude far into wilderness areas.

Response: The 100- to 200-foot distances described in the *Draft General Management Plan* (pg 118) define the distances from road center to the wilderness boundary. This frontcountry road corridor provides an area within which road maintenance and minor road reroutes may occur. Though in many cases the corridor does provide a visual transition zone and a less effective auditory transition zone between road and wilderness, its primary purpose is not as a buffer.

WILDLIFE

Comment: We recommend that "Reintroduce extirpated species" be added to mitigative measures and the restoration of extirpated species becomes a desired condition for the future of the park.

The plan should call for the restoration of all extirpated species.

Response: Desired conditions for native species were clarified in the final plan to recognize that restoring extirpated species is consistent with National Park Service policies and Olympic National Park goals. A plan to restore any extirpated species will be subject to analysis through an environmental assessment or environmental impact statement and public participation will be invited.

Comment: Decreased logging would drive the elk further out of their homes, as they need open areas for grazing.

Response: Most of the lands in the proposed Olympic National Park boundary expansion areas have been harvested and are at various stages of forest succession. In early forest successional stages (about 5-15 years after timber harvest), there are large amounts of herbaceous and shrub forage that support herds of elk and deer.

However the mid-stage of succession, which occurs approximately 20-40 years after harvest (and is often called stem exclusion or closed canopy stage), has little to no vegetation in the under or mid-story, and does not support many wildlife species, including deer and elk.

Without intervention, it takes a long time for natural processes (e.g. tree death, wind throw) to open the canopy enough to allow growth of a sufficient understory. Active forest management, such as thinning, can open the canopy at an earlier stage. Research has shown that thinned stands can provide forage and cover needed for a variety of wildlife species, including deer and elk, and increase the usefulness of second-growth stands.

However, mature forest stands, including old-growth forest, provide key foraging resources for deer and elk year-round on the Olympic Peninsula.

Comment: Your discussion of nonnative species is wholly lacking in direction for any nonnative wildlife. The Park Service has a recognized mandate to manage nonnative populations and where appropriate, remove them. This issue requires a much fuller discussion in the final Environmental Impact Statement.

Response: In accordance with NPS *Management Policies 2006*, the National Park Service manages populations of exotic plant and animal species, up to and including eradication, wherever such species threaten park resources or public health and when control is prudent and feasible (4.4.4).

The intent of the general management plan is to set broad desired conditions and the framework for future management of park resources and not to develop implementation level plans. As stated on page 81, (paragraph four) of the *Draft General Management Plan*, future studies and implementation plans will include program plans to examine the future management direction for

wildlife, fish, exotics, and nuisance animals within the park.

Comments: Mountain goats are a stately attraction and add to the wilderness experience. I have heard some very disturbing accounts of the cruel and inhumane treatment afforded to the goats the last time the Park Service engaged in [removal] operations.

Leave the mountain goats alone. They are historical and an interesting attraction. They can easily be controlled by proper placement of mineral blocks. They do not damage rare plants. Piper harebell, to name one species, usually grows in rock crevasses and cliff sides and plenty would be inaccessible to the goats. The Olympic Mountain Timothy is an annual and reseeds easily.

Response: A scientific review completed in 2000 by the Conservation Biology Institute concluded that "...the preponderance of evidence supports the view that the mountain goat has never been native to the Olympic Peninsula" (Noss, et al. 2000). National Park Service *Management Policies 2006* (4.4.4.2) directs park managers to manage nonnative species when control is prudent and feasible, and the species "interferes with natural processes and the perpetuation of natural features, native species or natural habitats." Mountain goats utilize rocky outcrop areas and are known to consume rare and endemic plant species that also occur in these habitats.

Placement of mineral blocks does not control mountain goat populations (Houston, et al. 1994). Any management plan for the goats will be subject to analysis through an environmental assessment or impact statement and public participation will be invited.

National Park Service biologists captured mountain goats intermittently from the late 1970s through the 1980s. Most were transferred to state wildlife departments and were released in other states. The welfare and careful treatment of the animals was a critical consideration in each capture operation.

Comment: The plan states that mountain goats are nonnative. Based on the Quinault Nation's review of the *General Management Plan*, we believe the plan discredits the goat sightings and artifact items provided by the Nation.

Response: While we acknowledge that some disagreement may exist, a scientific review was

completed in 2000 by the Conservation Biology Institute. It concluded that, “. . . the preponderance of evidence supports the view that the mountain goat has never been native to the Olympic Peninsula,” and, “. . . given the paleoecological and environmental history of the Olympic Peninsula, our team considers the probability relatively low that goats could have colonized the Peninsula at some time in the past,” and, “Most of us consider the ethnographic evidence (as reviewed by Schalk 1993) a powerful argument for the absence of a population of mountain goats on the Peninsula prior to the introductions in the 1920s.” (See: Noss, R. F. and R. Graham, D.R. McCullough, F.L. Ramsey, J. Seavey, C. Whitlock, M.P. Williams. Review of Scientific Material Relevant to the Occurrence, Ecosystem Role, and Tested Management Options for Mountain Goats in Olympic National Park. 2000. Report to U.S. Department of Interior.)

Comment: The *General Management Plan* offers inadequate measures for recovering threatened and endangered species or at-risk wildlife species.

Response: In accordance with NPS *Management Policies 2006* and National Park Service planning guidelines, the purpose of general management plans is to ensure that the park has a clearly defined direction for resource preservation and visitor use (2.3.1). General management plans are not meant to provide specific details on threatened and endangered species recovery or plans.

The National Park Service is involved in recovery plans when appropriate, and these plans provide the detailed information on the measures necessary for species recovery. A listing of some of the recovery plans that the National Park Service is involved with can be found on page 81. Depending on the magnitude of actions required by a recovery plan, subsequent environmental analysis and public involvement may occur prior to implementing recovery actions inside the park.

OTHER COMMENTS AND MODIFICATIONS TO THE GENERAL MANAGEMENT PLAN

Comment: There is an error on page 135 on the citation of the Treaty of Olympic

Response: This has been corrected in the final plan.

Comment: There is an omission in the description of the Quileute Tribe’s jurisdiction over islands. Smaller items near James Island that are connected to the reservation during periods of low tide (because the land bridges are entirely exposed) are part of the Quileute reservation.

Response: The intention of the plan is to provide a general description of area reservations and not to address current boundary disputes or issues.

Comment: The Park Service should consider safety issues when planning what parking lots to enlarge. We found not a word about improving the Third Beach facility. Yet in the summer cars not only fill the lot but park all over the roadside and create a traffic risk.

Response: This was considered under alternative C in the *Draft General Management Plan* (pages 328, 336-347). There is no expansion considered under the preferred alternative; however, if future conditions and safety concerns warrant an expansion or reconfiguration of the parking lot at Third Beach, the Park Service would work with the Quileute Tribe to explore options.

Comment: The Park Service discusses hazard trees on page 180 but does not discuss hazard rocks.

Response: The plan has been updated in the “Environmental Consequences, Cumulative Impacts” section to include additional information on the road management system. The road management program is intended to enhance visitor experience while providing safe and efficient accommodation of park visitors and to serve essential management access needs. It requires the routine maintenance and repair of road surfaces, roadsides, bridges, culverts, and ditches. Road maintenance also includes the placement and maintenance of roadside signs, road surface sanding and sweeping, the removal of obstructions or safety hazards (e.g. rocks and trees), and the removal of snow from the Hurricane Ridge Road.

Comment: There is little mention of tsunami risk to visitors and protection from this hazard. There should be discussion of what might happen at Rialto Beach, There should be signs, visitor advice, and directions.

Response: As we develop new visitor information kiosks, we will include information on tsunami risks. In addition, evacuation route signs are now in place. This level of specificity is not appropriate for

general management plans; however, we will continue to work with park partners and neighbors, including area tribes, to educate visitors about tsunami risks.

Comment: The lack of availability of cedar logs of suitable size has forced tribes to be unable to build traditional dugout canoes for twenty years. The traditional skills that are handed down generation to generation may be lost soon. The park has a multitude of suitable sized trees and should make one available for the use of the tribe.

Response: Any trees that fall within park developed areas or on roadways are assessed to determine if they could be used by area tribes. Unfortunately, not many suitable trees of appropriate size are found.

Comment: The park land that borders the southern and southeastern edges of the Hoh reservation should not be designated wilderness.

Response: Wilderness was designated in 1988 through a public process and there are no proposals to seek to remove the designation of wilderness south of the Hoh Reservation. Lands due east of the reservation are not designated wilderness.

Comment: Table 5 lists the Quinault River as "non-glacial" which is incorrect. The east fork is glacial and the north fork is nonglacial.

Response: We have changed table 5 with the corrections: East Fork is glacial; North Fork is not glacial.

Comment: The Olympic mudminnow, the Olympic torrent salamander, and the jumping slug are present outside of Olympic National Park.

Response: We have corrected this text in the final plan.

Comment: The related element is the recent US District Court decision regarding the Federal Regulatory Commission / Tacoma Power Cushman Project #460. The Court identified, in an August 18th 2006 decision, its support of certain improvements to the watershed conditions. The Department of Interior 4(e) conditions include supporting flow regime modifications, and fish passage past the two Cushman dams, in addition to other critical watershed enhancements. The implementation of these 4(e) conditions has long been a goal of supporting restoration of full

watershed integrity in its entirety, from the Skokomish estuary and delta to the headwaters of all basin tributaries. Such access includes passage past the dams that block the salmonids' ability to exhibit their anadromous characteristics. Such blockages have violated the Federal Power Act for 70+ years. Along with the out-of-basin diversion of the North Fork Skokomish, the fisheries and associated habitat have been deleteriously affected, challenging the treaty rights of the Tribe.

Response: The Department of the Interior proposed conditions for the protection and utilization of the Skokomish Indian Reservation pursuant to section 4(e) of the Federal Power Act. A recent appellate court recently determined that the Federal Energy Regulatory Commission erred in rejecting the Interior's conditions and remanded the matter to the Commission for further proceedings for including the conditions in the license. Olympic National Park supports these conditions as we believe that some of the fisheries measures will benefit park resources and tribal trust resources.

Comment: We encourage the Park Service to consider limited access for non-Tribal harvest of elk through a permitting process. The permitting process would allow an opportunity for education on Tribal culture and harvest management.

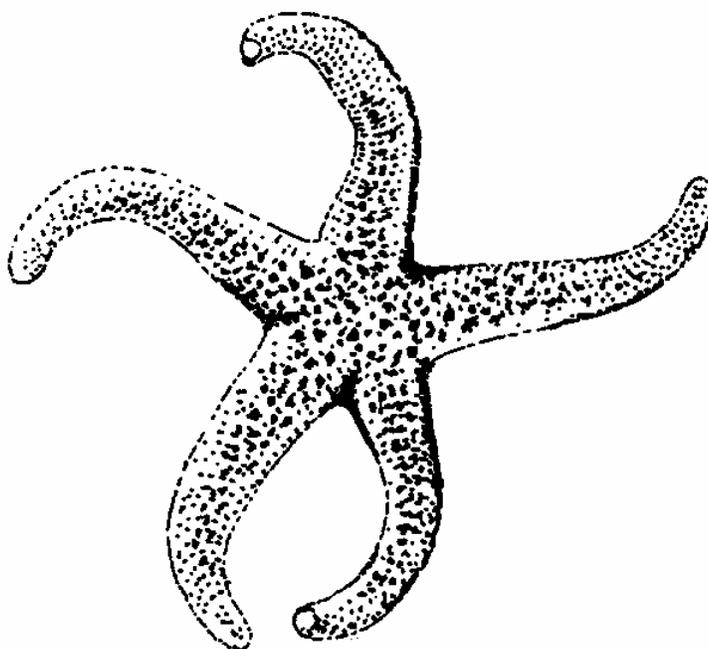
Response: Hunting is not permitted in the park in accordance with the enabling legislation for the park and regulated by 36 CFR Sections 2 and 3.

We do agree, however, that it is important to educate the public on Treaty-reserved harvest and tribal culture. As stated previously, the *Draft General Management Plan* identifies the need to expand the number and variety of education programs (page 148), the desired condition that education programs are available, and that one of the strategies to accomplish this desired condition is coordinating education programs with partners and focusing on improving the general understanding of park cultural resources (page 33). Working in partnership with the Quinault Nation to expand what is currently offered will contribute to the accomplishment of this desired condition. This can be done a number of different ways, and the park staff will work with the tribes to determine appropriate strategies. Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

COMMENT LETTERS

The following section shows reproductions of the comment letters from federal, state, and local governments; Indian tribes; interest groups and organizations; and businesses that provided comments on the draft plan. Due to the extensive number of comment letters, comment letters from

private citizens are not included in this final volume. Copies of all letters are available in electronic format, with individual names and addresses removed, and are available upon request. The responses to these letters are shown in the previous section.



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Comment 499–City of Forks

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Olympic National Park General Management Plan 28 Sep 2006
U.S. National Park Service
Denver Service Center
P.O. Box 25287
Denver, Colorado 80225 (Also sent via fax and e-mail to ensure receipt)

On behalf of the City of Forks, the following comments are submitted with regard to the Olympic National Park’s draft *Draft General Management Plan/Environmental Impact Statement*. The adoption of a general management plan (GMP) by the National Park Service (NPS) for the Olympic National Park (ONP) will be a milestone event having implications and impacts upon the Westend (Western Clallam and Jefferson County) for decades. The comments provided below regarding the draft GMP are divided into two categories: General/Overriding Comments; and, Specific/Technical Comments. Specific themes noted within the General Comments will be further explained in the Specific/Technical Comments as they relate to specific proposals within the GMP.

GENERAL COMMENTS

The National Park Service at Olympic National Park (ONP) has the responsibility of protecting unique resources and wildlife while ensuring a quality experience for all park visitors. Given this, we submit the following comments on the Park Service’s draft general management plan for Olympic National Park. Specifically, we believe the NPS would be better served with a final GMP that emphasizes the development of appropriate visitor facilities; expanded ranger programs; realistic and limited boundary adjustments; and, strengthened Park Service/community relationships.

Visitors that come to the ONP expect useful, appropriate and safe facilities that are adequately staffed providing modern, up-to-date interpretive materials and services. Yet, many facilities in the ONP are in desperate need of renovation, expansion or modernization, despite the heroic and tireless efforts of ONP staff to keep such facilities useable and open. It is imperative that the final GMP place paramount emphasis and duty on improving visitor access and park visitor experiences. This can be accomplished by augmenting existing infrastructure, where practical, with facilities such as additional bike paths, new trails such as the Spruce Railroad Trail, expansion of the lodging seasons, the development of new campground sites, developing access for retirees and seniors, and modernizing existing facilities at such places as the Hoh River.

We also believe that we need to reverse the systematic decline of what is nearly an endangered entity within the ONP – interpretive rangers and their associated program offerings. Visitors expect more from the NPS than large crowds of visitors trying to huddle around a ranger who is

City of Forks ONP GMP Comments Page 1 of 20

acting as an educator, interpreter, hike planner, camp ground fee collector, etc. Many middle-aged frequent NPS visitors will recall, and hope to partake, in such things as evening campfire talks and guided hikes. Yet, such programs are becoming increasingly rare, and as a result a truly profound and unique opportunity is lost by the NPS to develop with visitors a greater connection and appreciation for the ONP and the Service. In addition, the potential to attract visitors to the ONP's gateway communities in future trips may also be lost. There is no doubt that longer-stay and return visitors are good for local communities that cater to visitor needs. Therefore, the final GMP must emphasize the need to fully fund and expand the park's interpretive programs, while maintaining and improving its current information centers. One of the "unique resources" of ONP is its rangers. We are adamant about the NPS having a duty to protect and increase the number interpretative and the backcountry rangers in the park. This should be a higher priority than large boundary adjustments and cooperative public/private conservancy efforts on lands adjacent to, but not owned by, the ONP.

We understand that there may be limited situations where there is a need to adjust the boundary of the park and land acquisition may take place. We will not support, and stridently oppose, any adjustments that would directly impact the economic viability of our community and the economic clusters of our region. Nor, can we support efforts by NPS to expand the boundaries of ONP areas when such a proposal would add additional regulatory burdens to private land owners. When land transactions occur, it must be with truly willing landowners who approach NPS. The transactions with such landowners should be the direct result of fair, good faith, and honest negotiations that do not arise from undue pressure or influence by NPS staff. Finally, boundary adjustments should not come at the expense of maintaining existing infrastructure and visitor access, or at the expense of modernizing and improving outdated and/or undersized existing visitor related facilities. Put bluntly, NPS should focus its fiscal efforts on improving what it currently has rather than chasing additional acres it lacks the resources to manage.

Further, the NPS data, and analysis of the same, associated with the economic benefit of boundary expansions does not appear to comport with the *Information Quality Act* (44 U.S.C. Sec. 3516) and the guidance associated with said Act as provided by the Office of Management and Budget. The economic analysis appears to lack significant quality in the information provided and relied upon. It also appears that the projected costs of the Land Acquisition/Boundary Adjustments lacks significant quality, reproducibility and reliability to be relied upon. Also, the analysis appears to lack objectivity with regard to the total economic impact of specific proposed boundary expansions at Lake Ozette. The City would specifically request correction of the presentation and substance of the economic analysis of the Ozette area boundary expansion.

The NPS must strengthen its working relationships with surrounding communities. In addition, we applaud the NPS for specifically noting that the Olympic park staff must be actively engaged in the communities in and around park borders. We encourage the Park Service to implement this as soon as possible. Focus should be placed on increasing the community's understanding of ONP and marketing the region to the visiting public. We also believe that the ONP staff must be actively engaged in various state-directed local planning initiatives associated with Watershed Resource Inventory Planning and salmonid recovery efforts. In these particular forums, the ONP

has been absent even though it is one of the largest land owners with specific federal obligations associated with salmonid recovery.

We believe the implementation of these simple suggestions are in the best interests of the park, its stakeholders, gateway communities, resources and wildlife.

SPECIFIC/TECHNICAL COMMENTS:

Proposed Parkwide Policies and Desired Conditions

1. Air Quality, pg. 13. We applaud the NPS recognizing that it could be a partner in efforts to develop “clean fuels” and where applicable alternative transportation systems. Such proposed partnerships need to be publically vetted to ensure that there is (1) mutual benefit to those involved; and, (2) little to no impact to (a) the public’s ability to access existing entry points; and, (b) the local communities in and about the park.
2. Ecosystem Management, pg. 16. Again, we applaud the final recognition of the ONP staff that they in fact have to “participate in collaborative planning efforts with adjacent land managers and tribal governments” when it comes to ecosystem management. However, the continual loss of ONP staff FTEs has resulted in the ONP missing opportunities to do what has been proposed specifically in regards to salmonid recovery planning efforts on the North Olympic Peninsula; and, also with regard to watershed based planning initiatives (WRIA planning) that have been underway for the past five years. In many ways, the ability of the NPS to share information in these initiatives has been severely limited by their lack of staff. This may also explain why specific documents were not reviewed or analyzed in the GMP, because NPS staff were in most cases unable to participate in the development of watershed resource inventory area plans, salmonid recovery strategies, etc.

Protection of viewsheds raises a concern in that ONP’s holdings within specific watersheds and/or viewsheds may be only a small portion of the total landbase. However, if ONP is now wanting to utilize its presence as a way of extending land use controls outside of the boundaries of its ownership, such an approach must be limited to ensure that any such activities do not adversely undermine the existing economic clusters of the watershed/viewshed in question. Nor, exert undue influence over local jurisdictions having regulatory authority in those watersheds. Efforts to prevent such impacts to adjacent landowners must be incorporated into the plan.

3. Water Resources, pg. 18. As noted above, ONP may have missed an opportunity to discuss and collaborate on the development of instream flows, water quality and water related habitat issues by not being able to participate in WRIA 19 or WRIA 20 planning efforts. The lack of NPS participation was specifically noted and raised on certain occasions as discussions involved the various rivers, as well as Lake Ozette, that originate and/or flow through NPS territory. In addition, because of the nature in which waterways originate in NPS uplands, flow through private and state ownerships, and discharge in estuaries in and adjacent to NPS shorelines, the NPS needs to further explain

what role it plans to play in water quality issues with regard to the strategy of attaining “the highest possible water quality standards available under the Clean Water Act.”

4. Rivers and Floodplains, pg. 19. The strategy of identifying “park or visitor facilities located within” 100-year and 500-year floodplains is a prudent risk management objective. However, the strategy does not clearly identify what exactly NPS will do with such knowledge. In addition, later discussion of facilities at Mora, Hoh, and other such areas that would be retained unless “lost to a catastrophic event” appears to indicate a want by NPS to identify potential sites subject to such catastrophes, but do little to plan for replacement, movement, or improvement of such facilities to reduce such catastrophic losses.
5. Native Species, pg. 23. The strategy to promote harvest and management practices that protect wild salmonids is admirable. However, it appears to be an effort by the NPS to insert itself into a well defined, and litigated, system of salmonid management that involves the State of Washington and the recognized treaty tribes of the Olympic Peninsula working together as co-managers of said resource. While the NPS may have interests in these activities, those interests must be treated similar as any other interested party. In addition, NPS should be cognizant that its role in proscribing management practices is to be limited to those portions of streams and rivers within its existing boundaries. Advocating for regulatory changes outside of the park boundaries on the manner of harvest regulations, seasons, etc., in effect interferes with the rights of state and treaty tribe co-managers acting to protect each entities specific management rights.
6. Wilderness, pg. 26. The strategy to develop research activities associated with “wilderness ecosystem and key natural resources” is again admirable. However, the ONP existing budget appears to have little room for such activities and the associated needed facilities to undertake such research.
7. Archeological Resources, pg. 28. There appears to be no strategy as to how the ONP will approach archeological resources that may become threatened due to the environmental conditions of the Olympic Peninsula. Reference to such threats are noted within the “Desired Conditions Specific to Olympic National Park.” However, there does not appear to be an accompanying strategy that outlines an approach to address such a threat.
8. Historic Structures and Cultural Landscapes, pgs. 29-30. One continual concern that we have heard is that the NPS does not adequately protect the prairies, former homestead sites, and pioneer settlement areas within its landbase. These sites and landscapes may no longer have specific historic facilities, however, the earlier historic role they played are still visible via the plants and trees that remain from those pioneer settlements. Efforts should be made to further protect these sites, and provide historic interpretation information about these sites. Specific settlement activities within what is now the NPS do not appear to be referenced or addressed within the desired conditions and strategies: Lake Ozette, Queets Colony, Quinalt Homesteads, coastal homesteads, and Upper Hoh areas.

We are also specifically concerned about the approach to “Mission 66” structures and how this approach could significantly limit the NPS from making much needed improvements to such facilities as the Hoh Rainforest Visitor Center. We believe that the time has come to replace this outdated and undersized facility, and its original interpretative models. However, the strategy articulated in this section could add additional prohibitions to undertake any such improvements.

We also believe that there should be a strong articulation of the philosophy noted on GMP 79 that “benign neglect would not be considered an appropriate management strategy.” This strong statement would be greatly appreciated by many of the descendants of individuals whose families settled areas now within the ONP’s boundaries. In addition, local communities should be consulted prior to the removal of any historic structure through active NPS action or approved natural decay.

9. Museum Collections, pg. 32. We support the strategy associated with inventorying the ONP’s collections. However, we would argue that this strategy is somewhat outdated in that it does not identify or discuss the possibility of sharing this inventory with a larger audience than those that come to the ONP HQ to access the inventory. We would advocate for the inclusion of a strategy that involves the sharing of the inventory, if not the actual item, via a digital facsimile. The Community Museum Project, of which ONP has played a significant and exemplary role, has demonstrated an ability to inventory, categorize and share with anyone having access to the internet never before seen materials in the ONP’s possession. While this project is just now being unveiled to the general public, it is quite possible that the ONP contributions to it will be used by students, enthusiasts, researchers and visitors to better understand the Olympic Peninsula. In addition, the digitization of materials allows for access and use of the material with no further damage or impact to the original item. Finally, if a catastrophic event were to take place that resulted in the damage or loss of the museum collections, the digital images could be utilized by future generations thereby “blunting the sting” of any such tragic loss. The ONP could partner with the University of Washington, Peninsula College, local school districts, tribal governments, and other entities to make this happen.

10. Visitor Use, pg. 33. One condition and/or strategy not fully discussed is how the GMP will ensure access to all generations of park users. The extension of wilderness and focus on additional wilderness experiences appears to be missing the growing demographic of “retiring baby boomers” touring the Nation’s park at a time in their lives where endurance hiking and recreating may no longer be physically possible or their primary objective.

While discussed in greater detail below, the visitor’s experience at the Hoh Rainforest is extremely limited by lack of modern facilities, outdated interpretive materials, and limited audio-visual presentation that introduces the visitor to the continental United States’ only temperate rainforest. A desired condition should be modernized facilities that can in fact accommodate not only the number of visitors, but wide varieties of visitors and their various interests.

Outreach programs developed by ONP should actively, collaboratively and repeatedly involve local schools, tribes, and community organizations in their development, testing, and offering. Efforts should be made to work with local entities, as well as the State Office of the Superintendent of Public Instruction, to ensure such programs are scalable to various grades while fulfilling various state learning objectives and standards.

Web-based education needs to be a must and could be done in collaboration with state and local innovators such as the Washington Digital Commons, the Virtual Community Museum Project, as well as national institutions. Such web-based educational offerings need to be made free to the general public.

Lake Crescent Boundary Expansion – GMP 34.

We do not see any analysis of the impacts associated with the loss of the existing lands in the Olympic adaptive management area of approximately 700 acres owned by the USFS. GMP 34. These lands are subject to limited silviculture treatments pursuant to the Northwest Forest Plan (NWFP) and “will be used to develop and test management approaches which meet ecological, economic, and social objectives.” We believe the GMP has not thoroughly analyzed the impact of the NWFP and its associated protections already in place in relationship to the lake habitat. Regarding the 80 acres of DNR owned trust lands, more information would be required to determine what deferrals are currently in place on those lands. As noted below, the proposed alternative and the analysis of the conversion of state, as well as the private, lands lacks any economic impact analysis to (1) local economies; (2) tax base; (3) regarding state trust lands, the beneficiaries of such lands; etc. In addition, the presumption that harvesting of timber on state and private lands pursuant to the existing regulatory standards would result in adverse impacts to Cutthroat and Beardslee trout spawning habitat lacks any scientific reference or data. Also, the lack of analysis of economic impacts similar to those discussed below, albeit smaller in scale, needs to be addressed by the NPS in the final plan.

Lake Ozette Boundary Expansion – GMP 35-36.

1. The GMP does not appear to clearly indicate the total amount of acreage by owner categories (e.g., state land, large private land owners, small private land owners) associated with each proposed boundary adjustment for each of the ONP regions. What summary of the acreage per area can only be found at pg. 372 of the document. It is odd that this information is not more clearly articulated earlier in the document. Nor, does it appear to indicate the extent in acres by owner categories for the proposed “cooperative private/public land conservancy strategies.” This information, provided by park area and by each alternative would have been very helpful in undertaking further analysis of the proposals. The numbers provided only address property acquisition, and not the acreage envisioned by the NPS for “cooperative private/public land conservancy strategies.”
2. The City renews its request that the Lake Ozette Boundary Expansion discussion be corrected to accurately, and without bias, present the total economic impact associated with the preferred alternative. The boundary expansion proposal includes the transfer of

60,000 acres of private, actively managed forest land that supplies timber to area mills. As explained later in the document, approximately 12,000 acres is associated with the Park boundary expansion, as well as 44,000 acres to be acquired and transferred to the State in exchange for the state deeding mineral rights to the NPS. The impact of this loss of timber supply source, is not even remotely discussed in the document. The proposed additional acreage would, according to some within the timber industry, be adequate to supply one lumber mill with enough product to maintain 100 employees. The removal of such a large volume of harvestable land would appear to have an economic impact that should be discussed as part of any alternative other than the "Alternative A – Current Management" proposal. Pages 35-36, M21-24, 91, 230-232, 268-271, 306-308, and 346-348 have no reference to any possible impacts associated with the conversion of the existing timber lands into parklands. NPS Staff have attempted to explain that any detailed economic analysis of alternatives would be done after an alternative is chosen for adoption and a final EIS is issued. However, that would appear to be different than the usual NEPA process where efforts are made to analyze reasonably expected impacts from the proposed action of the federal agency. As currently written, the draft does not provide sufficient information to allow officials to make a reasonable choice between alternatives. Without such information, it would appear that that EIS and any decision thereon could be set aside by a court.

An additional topic that is not fully discussed in the GMP is the impact the expansion and DNR-NPS exchange would have upon the tax base relied upon by local governments. The concern is generated by the fact that the property in question is currently privately owned and paying private property taxes. By changing the ownership to federal and/or state owners there will be a direct economic impact upon the various local governmental districts that currently receive taxes from these land owners. In addition, none of those recipients of such revenues were contacted for specific information about such revenues in the development of this element of the plan. No reference to local government consultation can be found within the document regarding the preferred Lake Ozette alternative. See DEIS pgs. 354-356. When NPS staff was asked as to whether or not such entities were contacted, they informed City staff that they would be in the future. Nor, is it a valid assumption that federal "payment in lieu of taxes" would offset the loss in revenues associated with the change in ownership, use and tax status. Congress has not reauthorized that legislation and it is our understanding that a significant element in D.C. that remains uncertain as to the long-term future of such funding.

In addition, there is no reference to the fact that even the proposed designation will result in increased regulatory compliance of private and state timber management in those areas designated for future NPS ownership. No discussion has been provided as to how the proposed designation could result in timber managers having to comply with "Class IV Special" forest practice requirements pursuant to Washington Administrative Code provisions found in WAC Chapter 222-15. Any such compliance requirements will reduce revenues to private shareholders as a result of the private companies having to expend funds to meet these additional administrative requirements.

In addition, the discussion of the local economy appears to be solely based upon a precursory utilization of the Census 2000 data. However, it does not appear that efforts were made to glean additional economic information and research from such sources as the State of Washington Department of Revenue, Department of Community, Trade and Economic Development, research entities at the University of Washington or Washington State University, nor the local economic development entities such as the federally supported Peninsula Development Authority, the various county economic development councils, and municipal economic development officials. Outreach to these entities could have resulted in a more thorough assessment of the economic situation on the Olympic Peninsula and could have provided background information needed to undertake an analysis of specific proposals upon local and regional economies. One document that might be of interest and relevance would be the *Labor Market Analysis of Clallam County: A look at Wages and Employment between 1997 and 2004*, Daniel A. Underwood and Dan Axelsen, 29 Jun 2005. This report did extensive county specific economic analysis of the changes in the timber, tourism, and other economic clusters in Clallam County. Consultation with the Clallam County Economic Development Council might have brought such a document to the attention of the Denver-based authors of the GMP.

Further, the failure of the GMP to undertake a thorough analysis of such economic impacts may have resulted in the NPS dismissing the need to comply with Executive Order 12898 – Environmental Justice. As we understand it, this executive order requires agencies to analyze their actions as to how they will affect communities that include minority and/or low-income populations. Western Clallam and Jefferson Counties fall within this description. However, the reliance by the NPS on multi-county statistics, and its failure to utilize readily available research at a more localized community level (See for example, Dr. Annabel Kirschner's *Changing Conditions on the Olympic and Kitsap Peninsulas: 1990-2000* available on line at <http://www.crs.wsu.edu/outreach/ark/onrc/index.html>), appears to have resulted in NPS determining it did not need to comply with this Executive Order. The City of Forks' population in 2000 consisted of over 15% of the population being "Hispanic or Latino (of any race)", and 5% being "American Indian and Alaska Native". In addition, 14.6% of the families, and 20% of the individuals, living in Forks had incomes that were at or below the federal poverty levels. (Table DP-1 and DP-3, Geographic area: Forks City, Washington, U.S. Census Bureau, Census 2000).

Further, the draft GMP/EIS appears to emphasize possible improvements in the economic situation of the local communities by pointing to the various projects associated with implementing the GMP. However, in discussing those socio-economic impacts, there is no offset shown for the loss of jobs, direct or indirect, from timber management and harvest of those lands. As noted above, the proposed change in use of 60,000 acres of timber lands within Western Clallam County would have a significant impact on the available timber supply per year from private landowners. In a 1992 study of the impact of timber harvests to jobs undertaken by Richard Conway for the Washington Forest Protection Association and the WA Department of Natural Resources, it was demonstrated that approximately 8 direct jobs were created for every million board feet

of timber harvested. If that harvest was sustainable, those said jobs would be sustained as well. If the 60,000 acres would produce a sustainable harvest level of 30mmbf, then there is arguably 240 direct jobs associated with that acreage in Clallam and Jefferson Counties. It does not appear that any of the proposals, including the preferred, for the ONP's holdings in western Clallam and Jefferson counties would generate as many jobs as a result of implementing such proposals. Neither the GMP's *selected references or preparers or consultants* appears to include (1) third-party real estate appraisers, (2) economists versed in issues associated with the transference of land from managed timber to federal park designations; nor, (3) economists versed in the differences in direct and indirect job creation associated with specific land uses.

This request for correction is being sought pursuant to the Information Quality Act and the associated guidance provided to federal agencies by OMB due to the influential nature of the GMP.

3. The document fails to incorporate and review critical and historic documents associated with private and state timber land management that address concerns used to justify the land expansion. See pages 35-36, M21-24, 91, 230-232, 268-271, 306-308, and 346-348, 369-372. The specific documents that were not consulted or referenced with regard to their impact upon the lands proposed for NPS acquisition, or the concerns being addressed by NPS underlying the NPS proposal to acquire such lands include:
 - a. Washington State Department of Natural Resources Habitat Conservation Plan, Sept 1997. This document was approved by the federal services and addresses timber harvest activities, land management activities, conservation strategies for the Olympic Experimental State Forest which includes those DNR lands located in the Lake Ozette proposed expansion.
 - b. Washington State Forest and Fish Act adopted in 1999 by the State Legislature. This legislation requires timber land owners to take specific actions to address real and potential impacts to salmonid habitat across the State.
 - c. Washington State Forest Practices Habitat Conservation Plan, June 2006. A document signed by the Department of Interior and Commerce that provides an incidental take permit to the state for activities compliant with the State's forest practices act.
 - d. Washington State Department of Natural Resources policies and procedures associated with short and long term deferral of "mature (old-growth) forests".

In failing to consult these various forest practice related documents, the NPS may have obtained a false sense of urgency requiring the acquisition of additional property in order to protect species of concern. In fact, the above existing laws and agreements provide some of the highest level of protections ever in the State of Washington on private and state forest lands. By failing to consult these documents and analyze how they may increase protections on state and private managed timber lands, the NPS appears to have

rushed to judgment on the best means of providing perceived protections at an expense that may not be warranted to justifiable. In addition, some of the NPS perceived and projected future harms associated with legal timber management practices on private and state lands, (found for example at 202-203, 237-240, 325 and 370), appear to lack scientific data associated with those perceptions and projected impacts; or, in the alternative may rely upon scientific data that did not arise out of studies conducted after the implementation of the State HCP and the Forest and Fish Act.

The City would specifically ask for correction of this portion of the document to:

- reflect or cite the scientific data relied upon for these assertions;
- indicate whether the relied upon scientific data reflects the current forestry regulations in the state that have received federal services support; and,
- correct the document as necessary as a result of additional analysis undertaken with a thorough understanding of these critical documents as they relate to legal and permitted private and state harvest management activities.

4. DNR – NPS exchange. While the NPS is showing a level of innovation in proposing an exchange of lands between the NPS and the DNR as part of the Lake Ozette expansion, there are specific problems with the proposed exchange.
 - a. State forest lands (a.k.a. county trust lands or forest board transfer lands) would require specific state legislative action/authorization to permit any such exchange. See RCW 79.22.050, 79.22.060. Nor, would the proposed exchange comport with the one existing statutory exception to this prohibition on sale or transfer found at RCW 79.22.300. That exception allows state forest lands to be conveyed back to the benefiting county for county park usage with a right of reversion held by the state. RCW 79.22.300. There appears to be no reference to the need for state legislative action associated with any proposed exchange within the GMP. This oversight should be corrected.
 - b. The proposed exchange, specifically the proposed Legacy Forest elements, does not appear to comport with the Federal and State Habitat Conservation Plan and specifically the Olympic Experimental State Forest components. As noted in the HCP, a document that was not referenced or consulted apparently by the NPS (see pages 37-39, 393-398), the Olympic Experimental State Forest is to be managed as an “unzoned forest” which is described as “a forest in which no special zones are set aside exclusively for either species conservation or commodity production.” HCP IV.81. The proposed transfer of NPS acquired private timber lands in exchange for DNR lands and/or subsurface mineral rights owned by the State would appear to create a significant block with specific restrictions upon its management. Specifically, the GMP indicates that such a block would “involve an ecologically sustainable, best practices approach to forest management and could potentially be eligible for Forest Stewardship Council certification.” GMP 35. In asking NPS staff about this proposed exchange and whether or not it would be eligible for DNR regular management, the response seemed to indicate that this exchanged block would be subject to conditions and terms set by NPS.

The amount of this proposed transfer – being approximately 44,000 acres per the GMP at 379 – would be approximately 15-20% of the entire OESF. Such a bargain may run afoul of the HCP by creating a significant land mass within the OESF subject to different management requirements than the HCP and in effect zoning 44,000 additional acres in the OESF.

The issue of presupposing a level of conservation stewardship certification is addressed below. However, the phrase “an ecologically sustainable, best practices approach to forest management” appears to presume that the DNR is not already doing this. As noted, the DNR is subject not only to the referenced HCP, but also the various forest practices act requirements, and internal practices that could be argued to be the most protective forest practices laws and regulations in the nation. This specific phrase appears to reinforce our position that the GMP authors failed to consult, review and consider the application of the State’s Habitat Conservation Plan associated with DNR’s landbase.

- c. The GMP utilizes the term “Legacy Forest” and NPS staff (Richard Wagner) at the Forks Open House for the GMP noted that this was something proposed by Washington State Lands Commissioner Doug Sutherland. However, that is not an accurate reflection of what Commissioner Sutherland proposed and in fact, appears to either commandeer the Sutherland proposal, or confuse people regarding the intent of the NPS proffered block. The Sutherland “Legacy Trust” was one that would be actively managed per DNR’s regulatory and trust mandates for the purpose of generating new revenues for recreation and conservation. The Sutherland trust was a unique attempt to create a source of “continuous funding to support recreation on DNR-managed lands and to support stewardship for DNR-managed natural areas.” DNR FACT SHEET No. 02-143, 18 Sep 2002. The Sutherland proposal made it very clear that this trust would consist of lands comprised of “commercial forestlands” that would be part of the “working landscape” while generating revenues for a specific function “similar to how other state trust lands support specific beneficiaries such as schools.” *Id.*

The discussion of the Legacy Forest in the GMP, as clarified by NPS staff, does not appear to comport with the Sutherland proposal.

- d. Finally, and repeatedly, the proposed exchange lacks any economic analysis or discussion of beneficial or adverse impacts to the tax payers and/or trust beneficiaries. In addition, there appears to be no discussion of the value of the subsurface rights to ensure that any decision maker could understand whether a fair bargain was being proffered by the NPS to the State.
5. The extension of the “wilderness designation” and boundary to encompass 2nd and 3rd growth forests appears to be an act of misleading the public into believing that such managed stands would become wilderness in the future without some intervention. No detailed discussion appears to explain how such private and state commercial forest lands would be converted into either “wilderness trail”, “primitive wilderness” or “primeval

wilderness” zones. Much of the DNR holdings near the SE corner of Lake Ozette appear to be under 40 years of age and would take decades, if not centuries to develop into such zones. Yet, the plan does not discuss or address such issues.

6. The proposal, as discussed and explained on pgs. 35-36, appears to extend the ONP jurisdiction and influence even beyond the proposed boundary expansion. Specifically, the proposal speaks of protecting “the remainder of the Ozette Lake watershed,” as well as other watersheds within the ONP, through private/public land conservancy strategies. This element of the proposal has no economic analysis upon its impact on the lands outside of the proposed NPS expansion. The City does not support efforts by the NPS to extend its land use authority over property it does not own and in effect expanding the park in all but name and deed.
7. Finally, the cost estimates for the land acquisitions are not realistic, reliable or even accurate reflections of the true costs. The City is expressly concerned about the alleged costs of the Lake Ozette acquisition, and the four proffered alternatives and specifically requests for a change of information based upon accurate, reliable, unbiased, and objective data pursuant to the *Information Quality Act (44 U.S.C. Sec. 3516)*.

The City believes that the data associated with the alternatives as summarized in Table 2 is inaccurate. Recent transactions in western Clallam County have established a price for the purchase of commercial timber lands of at least \$2,500 per acre making the Lake Ozette expansion much higher than the total figure noted in the table for land acquisition for the preferred alternative. In addition, recent ESA Section 6 allocations from the USFWS associated with Western Rivers and the Hoh River Trust would indicate that conservation measures discussed through out the plan and the preferred alternative to protect viewsapes would cost approximately \$2,700+ per acre to acquire. For the most recent announcement, please see USFWS Press Release 06-109, *SECRETARY KEMPTHORNE ANNOUNCES \$67 MILLION IN GRANTS TO SUPPORT LAND ACQUISITION AND CONSERVATION PLANNING FOR ENDANGERED SPECIES - Washington Grants Total More Than \$20 Million*, 26 Sep 2006. Finally, the DNR’s 2005 appraisal, and the summary of that document entitled *05-07 Trustland Transfer Land & Timber Values*, for the Bite Hill Trust Land Transfer Project appears to affirm the City’s position that the NPS project estimates are unrealistic. DNR estimated the value of the 355 acres that make up the Bite Hill project as totaling \$2.23 million. These 355 acres are a small portion of the proposed Lake Ozette expansion proposed by NPS and are located to the immediate S/SW of southern most point of the lake. From the materials, some of which was redacted, obtained by the City pursuant to a Public Disclosure Act request in July 2006, it appears that approximately 1/3rd of the Bite Hill parcel has recently (+/- <5 years) been harvested. An associated document, provided pursuant to the City’s request of the DNR, notes that some harvest could be done within this stand pursuant to the HCP that could generate approximately \$30,000 per year from harvesting just ten trees per year. See memorandum entitled “*South Lake Ozette” parcel management plan for the OESF Dickodochtedar Landscape*. The information in this memorandum seems to imply that the July 2005 estimate for the Bite Hill acreage is probably at the lower end of the value scale. However, just using that 2005 estimate

found within the 05-07 Trustland Transfer Land & Timber Values, a figure of \$6,281 per acre would be an appropriate estimate for the Ozette region.

Using these three different sources, it is very easy to realize that the Ozette expansion is more than what is reflected in Table 2 of the GMP. GMP 64. That table estimates the costs of the preferred alternative’s land acquisition to be between \$18-24 million. However, the City suggests the following table may more accurately reflect just the cost of the 12,000 acres of the Lake Ozette boundary adjustment – not inclusive of the 44,000 acres associated with the DNR-NPS exchange:

Basis for cost estimate	No. of Acres	Price per acre per basis for cost estimate	Formula	Total estimated cost for the Lake Ozette Boundary Adjustment/ expansion
NPS Lake Ozette Acquisition	12,000 acres*	\$300-400 per acre**	12,000 x \$300 12,000 x \$400	\$3.6m - \$4.8m
Recent Timber Acquisitions	12,000 acres	\$2,500 per acre	12,000 x \$2,500	\$30m
ESA Section 6 – Hoh River award	12,000 acres	\$2,700 per acre	12,000 x \$2,700	\$32.4m
2005 DNR Bite Hill Estimate	12,000 acres	\$6,281 per acre	12,000 x \$6,281	\$75.4m

* For this table, we are only looking at the 12,000 acres to be added to the Ozette boundaries as described at GMP 372. However, Table 2 of the GMP (GMP 64) is reflecting a total cost inclusive of all acquisitions described on GMP 372.

** This does not include the 44,000 acres associated with the DNR-NPS exchange, nor any estimates on costs for the public/private conservation initiatives on lands adjacent to the ONP’s proposed holdings in the Ozette watershed. The amount of \$300-400 per acre used in this table is a result of taking the total of Alternative D for “Land Protection/Boundary Adjustments” (\$18-24m) and dividing that by the total additions found at page 372 including the 44,000 acres associated with the DNR-NPS exchange. Below is how that would be broken out in a somewhat similar table as above.

NPS Table 2 Total	59,940 acres	\$300-400 per acre	59,940 x \$300 59,940 x \$400	\$18m – \$24m
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The City would request, that pursuant to the *Information Quality Act*, this table’s costs estimates for “Land Protection/Boundary Adjustments” be reevaluated for accuracy and objectivity, that the data be shared with the public that was used to determine the total amounts provided for each of the four alternatives, and if necessary, provide a peer review of such data to ensure its accuracy, reliability and objectivity.

Planning Issues – GMP 41.

ONP should be applauded for recognizing that it needs to develop partnerships to “protect park resources and provide for visitor enjoyment.” GMP 41. However, it is interesting that there is no specific item that ensures that the Park work better with local governments to

create such partnerships. The issues associated with the “Tribal Relations” element could equally be raised and reviewed for gateway communities and county governments. We understand that the NPS has a specific, constitution and treaty-based trust obligation with the tribal nations of the Olympic Peninsula that is unique to those governments. However, we believe that the concepts noted in the “Tribal Relations” could be a frame work for the development of initiatives with local entities and the NPS.

Impact Topics

1. Without reasserting the concerns about the socio-economic analysis here for a second time, the City renews and reincorporates those concerns expressed above and reiterates the request for (1) changes to analysis and data, or lack there of, used in the GMP; and (2) further analysis of the economic impacts of the proposed boundary expansion on the economic base of Western Clallam County.
2. Without reiterating the position stated above, but reincorporating it here, the City believes that the NPS failed to comply with the wording and intent of Executive Order 12898 regarding environmental justice as it relates to minority and low-income populations of Western Clallam and Jefferson Counties. The boundary expansion could have a direct impact upon communities such as Neah Bay, Clallam Bay/Seki, Forks, La Push and Western Jefferson County. However, by amalgamating the four county’s population and economic data, the NPS appears to have avoided compliance with the executive order and some of the guidelines quoted in the GMP. GMP 47. The City requests that the data analysis be undertaken to look at its impacts within areas or regions of the Olympic Peninsula to determine if in fact the NPS correctly determined that environmental justice was a topic that did not require further evaluation by the NPS. GMP 48.
3. We are uncertain that the assumption that the plan would not impact unique farmlands is correct, for both the Alternative B and Alternative D for the Lake Ozette Region may in fact impact lands that were once farmed and could be farmed again. Further analysis may be required to determine if in fact the GMP has “no impacts on primary or unique farmlands” in the Ozette basin. GMP 49.
4. The City is not supportive of “further studies of eligibility” for Wild and Scenic River designation for the Bogachiel, Calawah, Sol Duc and Hoh Rivers. There have been previous, and very contentious efforts associated with such efforts to designate these rivers as “wild and scenic” in their entirety, or portions thereof outside of the boundaries of the ONP.

The Alternatives

The following comments are focused on specific ONP regions and the preferred alternative (Alternative D) as presented within the GMP. The issues of boundary adjustments are not reiterated below, as they were dealt with in great detail already.

1. Elwha – This area is outside of our City’s usual “sphere of concern.” However, one thing puzzled us regarding the CCC Campground site. M12 notes that the “former historic

CCC campground at Olympic Hot Springs would be rehabilitated with some sites removed.” We are concerned that the removal of camping sites within that historic property would reduce access to campers, while also altering a historic property that the GMP indicates the NPS is wanting to protect.

The establishment of the proposed development zone and day use in the Elwha area makes logical sense and provides a significant level of flexibility for the mark to (a) relocate facilities that may be lost in the natural processes that return to the river valley as a result of the Elwha Restoration Project; (b) allow for expansion of traditional camping opportunities; and, (c) allow for new infrastructure to be developed such as “pull-through” camping locations that could be utilized by the numerous recreational vehicles and travel trailers.

2. Lake Crescent – We support the designation of the environs along the North Shore Road and the Spruce Railroad Trail, and the East Beach Picnic area as day use. This recognizes what has in fact been the utilization of these areas for decades. It may also be logical to extend such day use designations, or seek the approval from Congress to do so, to Marymere Falls.

We also support the efforts to develop along Lake Crescent greater access through the NPS’ development of a universally accessible trail. However, any such trail must include an increased level of educational and interpretative information that currently exists about Lake Crescent.

As noted above, there is little in the way of interpretive and educational information about the geology, ecology, cultural and historical importance of Lake Crescent readily available to the visiting public. The GMP should consider developing specific locations on the west and east entrances to Lake Crescent that allow for automobile pullouts that provide some of this information to the visitors. Existing locations may be available for such activities, but would require the development of interpretative materials. Another option would be to utilize low range radio repeating broadcasts that provide such information to the visiting public.

3. Sol Duc – We support the additional area designated as “development zone” to the N/NW of the Resort. Here again this allows for the flexibility to relocate existing facilities if lost, or develop other access options such as low-impact campgrounds, pull throughs, etc. It also might be logical to extend day use designations, or seek the approval from Congress to do so, to Sol Duc Falls.

The pursuit of a seasonal transit system could provide another form of access to this region of the ONP, however, any parking facility would need to be secured in some fashion. In addition, the GMP does not appear to have designated any place within the region for parking and catching such transportation options.

Further clarification should be provided as to what factors will determine whether

facilities are relocated and/or expanded in this region of the Park, as well as its other regions.

4. Ozette – non-boundary adjustment issues, etc., already raised – We support the designation of the northern portion of Swan Bay as “day use.” However, we question why only minimum facilities would be provided at the associated boat launch that would be kept at this location. In addition to educational and interpretative information, visitor facilities such as privies, picnic tables, trash receptacles, etc., should be provided and maintained in this zone.

We are not supportive of the idea of closing the Rayonier Landing. Information provided to us by former Rayonier employees lend credence to the Ozette community’s position that this boat landing site was, is and should continue to be an access point to the Lake.

We believe that boating of all types should be permitted on the Lake. An we stridently oppose efforts by NPS to reinterpret the intentions of Congress regarding all forms of boating as noted in the Congressional Record of 1976 (Senate 1 Oct 1976 – Comments of Sen. Henry Jackson; and, House 29 Oct 1976 – Comments of Rep. Don Bonker). Boating, as used by both of these political advocates for the Ozette designation included both non-motorized and motorized boating activities. Any effort to prohibit motorized boating on Lake Ozette would not be consistent with the intent of Congress, would limit access and recreational opportunities, and would extend the wilderness borders of Lake Ozette without Congressional Action to the surface of the Lake.

We disagree with the proposal to redesignate and/or relocate camping opportunities now at the Ozette Campground to locations outside of the Ozette area of the ONP. Better utilization of the development zone at the western terminal of the paved road could result in additional, low impact camping sites. Under the proposed boundary adjustment there would be no other location near or overlooking the lake to camp that would be outside of the ONP.

We are uncertain how a universally accessible front country trail could be developed without designating additional area as either “development zone” or “day use.”

5. Mora – We support the designation of most of the area associated with the NPS portion of the Mora Road/Rialto Beach Road as “day use.”

We are concerned that the approach to Rialto Beach, following any catastrophic event, would be return to a “frontcountry accessible trail” rather than a universally accessible trail. As it currently is, Rialto Beach is one of the few places where individuals of nearly all ability can access the Pacific Ocean along the northern portion of the coast strip. In addition, all Rialto Beach facilities should be reestablished at a new trailhead if the existing facilities are lost in such an event.

We are also very supportive of the idea of a NPS-Quileute Tribe endeavor to provide boat or canoe service from Mora to La Push.

However, we are extremely disappointed that the ONP GMP does not discuss, nor provide possible solutions to, the decade running boundary dispute with the Quileute Tribe. While we are understanding of the continued efforts to resolve this issue, the GMP should indicate that some alteration, unknown or undesignated, could result into the boundaries of the ONP as a result of such a settlement. Failure to mention this issue, and articulate the NPS' intentions to resolve it, seems to undercut the goals articulated elsewhere within the GMP regarding a want by the NPS to improve its relationship with the Peninsula's tribal nations.

6. Hoh – We support the designation changes found within the preferred alternative in and about the Visitor Center and Campground. Such designations more accurately reflect the type of activities currently taking place in and about that area. The City looks forward to working with ONP staff, local community members, and other interested parties in the creation of a development plan for that portion of the ONP. We believe that such a planning process needs to be made a high priority by ONP.

We are extremely supportive of the identification of the need to relocate the existing roadway away from the Hoh River's meander areas and would work with NPS to seek any required Congressional approvals to make that a reality. Such an effort should be part of a larger effort that also looks at relocating portions of Jefferson County's Upper Hoh Road. In addition, the City would hope that the NPS would work with the local community to seek appropriate federal designation and appropriations to address repairs, improvements, and relocation of the non-NPS portions of that road segment.

We are extremely pleased to see recognition of the need to improve the Hoh Visitor Center. This building, part of the historic Mission 66 initiative, is no longer meeting the needs of the visiting public to this portion of the ONP. The facility, maintained as a result of heroic staff efforts, is too small for the number of visitors that utilize it each year, lacks adequate interpretative and educational facilities, and has aging infrastructure no longer adequate to meet the demands associated with current use. We believe that a facility could be constructed utilizing modern, low/no-impact building methods that could provide better services to the visiting public and reduce maintenance costs. It is our position that this should be the number one replacement priority within the ONP system, and the City would be interested in working with ONP and NPS Regional staff to pursue such an improvement. Until that facility can be constructed, we believe that the ONP should make a conscious effort to modernize the interpretative information within the existing building to better reflect current knowledge and best available science on the ecosystems in this portion of the ONP.

The concept of a seasonal transit system originating outside of the ONP deserves a significant assessment. However, we would not be supportive of any such system that would not allow visitors to visit existing businesses along the Upper Hoh Road. Any system would need to be developed in close coordination with the residents and business owners of the Hoh Valley and other interested organizations. The City would be very interested in participating in such a study.

One thing that does not make sense, however, is the lack of any development zone designation in the area designated as the “potential location for relocation of existing facilities.” We would be supportive of NPS efforts to seek congressional approval to modify wilderness designations for such a designation. At a minimum, some acknowledgement of day use in and about the trail head in that area should be reflected in the GMP.

7. Kalaloch – We support the increase in the development zone in and about Kalaloch Creek. Such a designation will allow for a modification to existing facilities, or the relocation of some of those facilities. We believe efforts should be made by NPS to designate the western terminal of the Oil City Road, and the associated trailhead located there, as either low use or day use. If Congressional approval to do so would be required, we would be supportive of efforts by NPS to seek such approval. This area is currently being used in that capacity and the GMP should recognize this fact. We also believe that the roadway and area in and about the “Big Cedar Tree” should be designated day use.

We are intrigued in the idea of a relocation of SR 101 in this area. The City would be interested in participating in any study or discussions of such a relocation and the various proposed routes.

We also are supportive of the proposal to create an appropriate visitors center in the Kalaloch area that would highlight the unique coastal elements of the ONP. In addition to cultural resources, such a facility could also highlight the historical maritime nature of the NW Pacific Coast. However, we believe that this should occur after addressing the critical needs at the Hoh Rainforest.

8. Queets – We believe that there should be some recognition of the campground and boat ramp as “day use” within the GMP to reflect how in fact that area is utilized. As noted earlier, additional interpretative information about the historical efforts within the valley to develop it should be addressed.
9. Quinault – We support the idea of expanding visitor services within the watershed and agree that such facilities could be located outside of the ONP boundaries in conjunction with other partners.
10. Wilderness. Except for the wilderness extension to the proposed Lake Ozette acquisition, the City is supportive of the preferred alternative that in effect keeps in place the current management approaches .

Other Comments

1. Table 5: Park Watersheds, GMP 103. We are confused as to why information was “not available” for this table regarding “percent of watershed in the Park.” In addition to various local sources, such information could easily be obtained from a simple GIS inquiry.

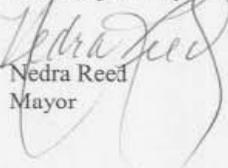
2. Olympic Peninsula Tribes, GMP 135. The paragraph regarding the “usual and accustomed areas” of the Quileute and Hoh Tribes seems to simplify, and may as a result inaccurately reflect these areas. In addition, it is our understanding that the Quileute and the Hoh Tribes have specific management rights and responsibilities for the specific drainages listed in this paragraph. It may need to be rewritten to better reflect these things.
3. Visitation, crowding, survey results, GMP 139. It is of no surprise to us that these surveys referenced the Hoh Rain Forest as a crowded area considering its visitor center was designed and built for some 15,000 visitors and receives nearly 16 times that number each year. As noted earlier, replacement of that existing facility needs to be one of the highest new construction efforts of the ONP.
4. Information, Orientation, and Interpretation (IOI)– general. One thing that we find peculiar is the lack of readily accessible interpretative information on the geology, ecology, cultural and historical aspects of the ONP at the various regions outside of the ONP HQ. While some kiosks do exist, as noted at GMP 146, there are not such kiosks at Lake Crescent’s parking lot and restroom facilities, at either entrance to the Lake, Mora and Rialto Beach, etc. In addition, it does not appear that the cultural and historical aspects of the ONP are provided at various locations. ONP is a crown jewel for its ecological attributes, but the cultural and historical aspects should not be hidden from the visiting public, but rather added to the many other remarkable gems in that crown.
5. IOI – Hoh. We will not disagree with the assessment of the Hoh Rain Forest Visitor Center found at GMP 147. We would only reiterate that because of these reasons a new visitor center is a must. We believe additional IOI resources need to be made available to the Hoh based upon the visitor center contacts noted within Table 7: annual recreation visits by district found at GMP 138. We feel that these numbers clearly argue for a higher priority for the replacing of the Hoh Rain Forest Visitor Center that can meet such a demand.
6. IOI – Kalaloch. We concur with this assessment as well, and second to the Hoh Rain Forest Visitor Center, and believe it too needs to be replaced.
7. IOI/Education. ONP should take a more active and engaged effort with gateway community school districts, and webbased learning providers, to develop curriculum that could aid student learning. Such activities would not only increase awareness of the ONP, but in all likelihood help develop the next generation of ONP visitors and users.
8. SocioEconomic Environment, GMP 163-173. As discussed elsewhere, the City believes that this element is precursory and does not accurately reflect some of the economic issues associated with the various subregions and gateway communities neighboring the ONP. This element needs to be thoroughly reworked to the point that every neighboring tribal nation, as well as each gateway community, is covered in as much detail as the Jamestown S’Klallam Reservation. While county-wide information may be accurate, it

may hide disparities within each county between subregions. Such information is available and was publicly shared throughout the region a few years ago as a result of efforts by various local governments to look at the changes between census years. As noted above, the NPS should have availed itself of the local knowledge and research information undertaken as part of the various economic development initiatives within the region. However, for some unknown reason, only one specific jurisdiction was chosen for such an undertaking.

9. Forest Information Station in Forks, GMP 333. We are uncertain what is meant by “minimal interpretation and opportunities for visitors to learn about park and forest resources, and help with safe trip-planning.” We are certain that this poorly worded reference to the Forks facility is not implying that the NPS staff that provide that information on a daily basis are providing “minimal” information. We strongly believe that this is one of the few places outside of the ONP HQ where a wide variety of services and information can be obtained with relative ease from some of the best informed, highly motivated, and easy to approach NPS staff in the ONP.
10. Impacts on the Socioeconomic Environment, GMP 346-348. Most of the significant, substantive concerns about this section were addressed elsewhere. However, there is no clear discussion of the loss of ONP staff over the past 30 years by area of function and duty. We believe that the general public probably should know where those losses have occurred, why they have occurred, and what impacts those losses have had on the local economy.
11. The GMP should include the latest “facility condition index” ratings for the ONP’s various facilities. In addition, a discussion of the maintenance backlog for the ONP should be a significantly important appendix discussion to the GMP. Such an appendix would allow future generations to determine whether or not the adopted GMP in effect addressed these specific facility and maintenance related issues.

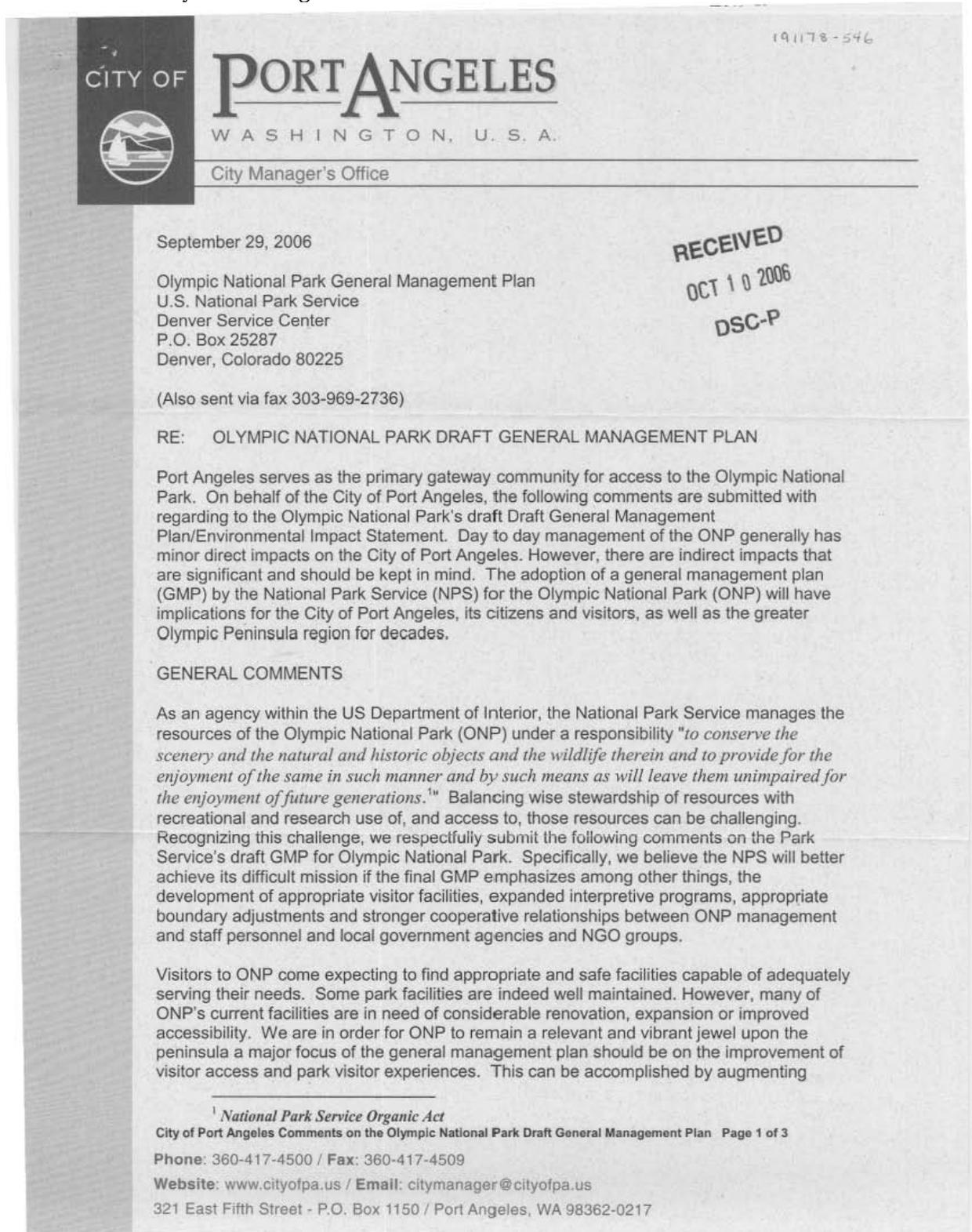
We appreciate the opportunity to provide these comments to the NPS on the Olympic National Park’s draft General Management Plan. We look forward to working with the ONP as it develops a new chapter in its history on the Olympic Peninsula. We are hopeful that the ONP will continue to develop and engage its local communities in its development, management and operations.

Most respectfully submitted on behalf of the City of Forks,


Nedra Reed
Mayor


William R. Fleck
Attorney/Planner

Comment 546—City of Port Angeles



existing infrastructure, where practical, with facilities such as additional bike paths, new trails, expansion of the lodging seasons, the development of new campground sites, developing and improving access for seniors and others people with physical limitation. Furthermore many facilities are showing significant evidence of deferred maintenance.

The City of Port Angeles therefore encourages the improvement of visitor facilities and access in the front country, especially for individuals with limited abilities to enjoy the less accessible portions of the park. The city would also support a shift in NPS policy and ONP management interpretation and implementation of such policies that Park concessions be operated more by local vendors rather than out-of-area franchise vendors. Furthermore we would like to see policies that encourage concessionaires to make more locally made products available in the concessions rather than trinkets produced off-shore.

The draft GMP outlines several proposed property acquisitions. We understand that future park boundary adjustment and land acquisition may be in keeping with sound stewardship practices. However, these adjustments and acquisitions should not come at the expense of the livelihood of community members and the existing economic foundations of the region. The NPS cannot be allowed to undertake a proposal to expand the boundaries of ONP areas when such a proposal would add additional regulatory burdens to private land owners. Emphasis on land acquisition should be placed on those landowners who approach the NPS willing to sell their property. Furthermore those acquisitions must be the result of fair and honest negotiations that do not arise from undue pressure or influence by NPS staff. Finally, boundary adjustments should not come at the expense of maintaining existing infrastructure and visitor access, or at the expense of modernizing and improving outdated and/or undersized existing visitor related facilities.

The City of Port Angeles is interested in the health of local fisheries and has witnessed a decline in both the commercial fishing industry and the sport fishing industry. In that regard, the city has worked closely with local tribes, the county and cities making up the North Olympic Lead Entity Group for salmon recovery as part of the State's Salmon Recovery Initiative. It is in the City's best interest to maintain a healthy fishery on the north Olympic Peninsula. These fish species are the Lake Ozette sockeye salmon and the Beardslee and Crescent trout found in the area of Lake Crescent.

However, the NPS data, and analysis of proposed acquisitions, associated with the economic benefit of boundary expansions does not appear to comply with the Information Quality Act and the guidance associated with said Act as provided by the Office of Management and Budget. The economic analysis appears to lack significant quality in the information provided and relied upon. In addition, the analysis appears to lack objectivity with regard to the total economic impact of specific proposed boundary expansions at Lake Ozette and in the vicinity of Crescent Lake. The City would specifically request correction of the presentation and substance of the economic analysis of both the Lake Crescent and Lake Ozette area boundary expansions. This request is based upon the a belief that the proposed expansion will create additional regulatory burdens upon private and state timber lands owners/managers resulting in additional costs associated with timber management.

Very specifically, in relation to the proposed acquisitions in the area of Lake Crescent would bring private commercially productive timber lands under the control and management of the NPS for the intended purpose of protecting riparian habitat for the Beardslee and Crescent Trout populations of Lake Crescent. However, critical area regulations for timberland

management practices provide the necessary and sufficient protections for such habitat and wildlife protection.

Much of the acreage is owned by private timber interests and removal of the large amount of area from timber production, especially as proposed in Alternative B, could have widespread economic impacts on the local timber industry. These impacts could affect the operation of existing mills, the prospects for creation of new mills, and the employment level of individuals in the forest industry generally.

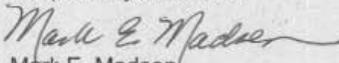
We encourage NPS must to strengthen its working relationships with surrounding communities. It is appropriate that the NPS in this draft GMP has specifically noting that the Olympic park staff must be actively engaged in the communities in and around park borders. We encourage the Park Service to implement this engagement as soon as possible and focus on increasing the communities' understanding of ONP and marketing the region to the visiting public. We also believe that the ONP staff must be actively engaged in various state-directed local planning initiatives associated with Watershed Resource Inventory Planning and salmon recovery efforts. In these particular forums, the ONP has been absent even though it is one of the largest land owners with specific federal obligations associated with salmon recovery.

We believe the implementation of these simple suggestions are in the best interests of the park, its stakeholders, gateway communities, resources and wildlife.

We recognize that the GMP is based on NPS Park management policies and principles, and is not based on financial considerations, even though it does carry financial implications. The GMP clearly stated that any alternative is contingent upon money being available and allocated through traditional funding sources. The City remains concerns that the ONP has not received funding from Congress necessary to carry out its mission. Furthermore, we are concerned that continuation of this practice will not only limit implementation of a final GMP, but will further degrade the ONP through attrition of staff, discontinuance of services and programs, and neglect of facilities.

The City recognizes and appreciates the wide range of benefits that Olympic National Park brings to the city and region in the form of environmental health, resource protection, tourist trade, research dollars, and world wide publicity. We appreciate the effort that has gone into development of the draft GMP and the opportunity to comment on the Plan.

Respectfully submitted


Mark E. Madsen
City Manager

Comment 502-Clallam County Commissioner Mike Doherty

09/29/06 FRI 16:00 FAX 3604172493

CLALLAM COUNTY

PEPC 191020 -502
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**Board of Clallam
County Commissioners**

223 East 4th Street, Suite 4
Port Angeles, WA 98362-3015
360.417.2233 Fax: 360.417.2493
Email mdoherty@co.clallam.wa.us

*From the Desk of
COMMISSIONER MIKE DOHERTY*

File: A31.49.16.15.15

29 September 2006

Mr. Cliff Hawkes
Olympic National Park – GMP
National Park Service
Denver Service Center – Planning
P.O. Box 25287
Denver, Colorado 80225

RE: Draft General Management Plan/EIS for Olympic National Park

Thank you for the opportunity to comment on the Draft General Management Plan/EIS (GMP) for the Olympic National Park.

For many decades, the federal government has assisted in conserving "outstanding segments of our native landscape for public inspiration and enjoyment" in our region. In 1909, with the creation of the Mount Olympus National Monument, the federal government established a permanent reserve in the center of the Olympic Peninsula. Expansion of the reserve has generally benefited the economy and the quality of life of our citizens.

When President Franklin D. Roosevelt visited the Olympic Peninsula in 1937, he stated that we must look fifty years ahead to set aside an appropriate park resource for future generations. It is long past fifty years since his visit and significant areas have been added to the Park, expanding Roosevelt's initial "Olympic National Park." The "future generations" in Roosevelt's mind have generally found the park very adequate.

At this time, we do not endorse any of the large boundary expansions proposed in the draft plan. In the area near Lake Crescent, we would appreciate much more scientific analysis prior to further consideration by the Park to include habitat protection to the Beardslee and Crescenti fish stock.

Applied to some areas of the Park, a further analysis of "River Zones" seems appropriate. Local, state, tribal, and federal government agencies and private land owners are working to restore Salmon habitat and an expansion of the "River Zone" concept may be appropriate along some rivers.

For decades, the Quileute Tribe has been involved in boundary disputes with the US National Park Service. We appreciate the Olympic National Park administrator for continuing to negotiate with the Tribe to try to reach mutually agreeable solutions to the boundary disputes and the need for additional lands to be incorporated within an expanded Reservation. We are hopeful that the

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Mr. Cliff Hawkes
29 September 2006
Page 2

negotiations will reach a meaningful conclusion soon so the Quileute Tribe can expand housing and other infrastructure outside of the tsunami zone.

The regional economy of our area is diversifying but continues to rely significantly on natural resources, particularly forest and marine resources. While industries related to both of these areas have declined in recent decades, they remain significant anchors to our economy.

In the GMP socio-economic impact analysis, more work is needed to clarify and predict impacts to the local economy. The loss of commercial forest lands, through proposed boundary adjustments, will have a significantly greater impact on our local economy than the draft GMP states. We believe that primary and secondary employment loss with the timber industry will be far greater than GMP states.

The maximum possible withdrawal from the commercial forest land base appears to be 60,000 acres. It has been estimated that this would equate to approximately the annual supply/throughout of one modern mill on the Peninsula. Private businesses, local governments, and other area economic development groups have been looking for ways to attract another mill to the Peninsula which could find a niche in the diversification and value-added evolution of the forest products industry.

An additional, local regional economic development project, involved siting energy generation facilities in this region which would use mill waste and forest residuals as a fuel source. The withdrawal of commercial forest land base will impact this economic development project; the lack of analysis of the impacts of such withdrawals would appear to conflict with both state and national public policy which encourage development of alternate energy sources.

The GMP proposes that the Washington State Department of Natural Resources (DNR) managed as a "Legacy Forest," a large block of presently privately held commercial forest. The record of the DNR's "Legacy Trust" program is yet to be developed. Only a couple of years old, this program has seen little activity and has no record of precedent. The DNR has a duty under the State Constitution to manage the majority of lands under their jurisdiction to benefit trusts. Management for preservation has not been a traditional role for the DNR. The National Park Service should consult with trust beneficiaries before further pursuing this concept.

The public comment record reflects a serious concern, stated primarily by representatives of the timber industry, that the GMP fails to acknowledge provisions of the Washington State Forest Practices Act and the Habitat Conservation Plan as adequately meeting compliance with the Endangered Species Act protective measures. The GMP process should further discuss these habitat conservation requirements and analyze their adequacy when applied to lands subject to the GMP.

We support an ecosystem management approach. A holistic management strategy is appropriate for the conservation of ecological functions. Several of the proposed boundary modifications may support the ecosystem management concept; however, more scientific analysis should be performed and presented to the public. In the future, the Park Service should provide more interpretive and education programs regarding the importance of this concept.

09/29/06 FRI 16:01 FAX 3604172493

CLALLAM COUNTY

004

Mr. Cliff Hawkes
September 29, 2006
Page 3

Any discussions of boundary modifications and restrictions on the use of federal lands should include consideration of federal impact funds provided to area local governments to affect the loss of property taxes, timber excise taxes, etc. Existing federal programs, including the Payments-in-Lieu-of-Taxes (PILT) program and the Secure Schools and Communities Act are inadequate at this time. Although the PILT program is regularly reauthorized, it has never been fully appropriated. And the Secure Schools and Communities program expires this year. While we continue to request an extension of the existing program and a solution to permanent funding, factually this program is not a reliable source of financial impact mitigation.

The potential loss of state revenue covered by withdrawing additional lands from the commercial forest base could be very significant to Clallam County and other local government entities. This impact should be further analyzed and mitigation proposals presented for review and comment.

Access to traditional recreational activities, valued by generations of Clallam County residents and visitors, should be maintained. For example, skiing at Hurricane Ridge and boating on Lake Ozette.

Future expansion of recreational facilities (RV parks, restaurants, lodging) should be encouraged outside of the boundaries of ONP – to preserve the current level of protection of park resources and to stimulate private involvement outside of the Park.

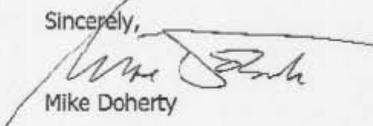
Support for public transportation of visitors seems very appropriate for several areas of the Park. Particularly, the route to/from Hurricane Ridge should be subject to a phase-in of a public transit shuttle.

We commend the Olympic National Park administration for the expansion of the cultural resource program in the last decade. Preserving the history of Native Americans and White settlement in the areas included into the jurisdiction of Olympic National Park remains a valued service to tribes, pioneer families, and visitors alike. Please maintain and expand cultural resource programs.

We appreciate the working relationship we have with the Olympic National Park staff related to the planning and construction of the Olympic Discovery Trail. Future generations will be grateful that the Park assisted with this project.

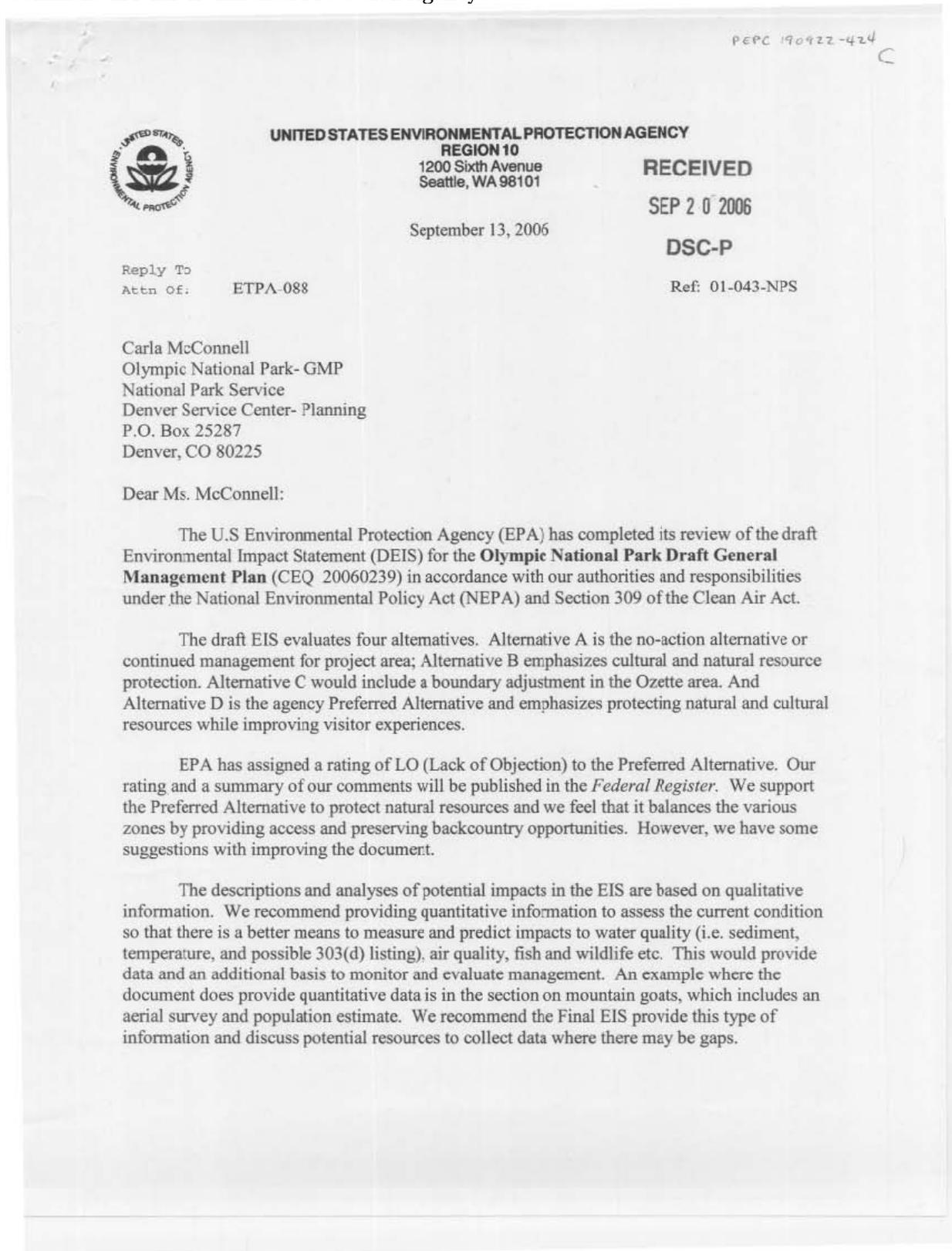
Thank you for the opportunity to submit comments on the Draft General Management Plan for the Olympic National Park.

Sincerely,



Mike Doherty

Comment 424-Environmental Protection Agency



Thank you for the opportunity to comment on the draft EIS. A copy of the rating system used in conducting our review is enclosed for your reference. Please feel free to contact Lynne McWhorter at (206) 553-0205 with any question that you have.

Sincerely,



Christine Reichgott, Manager
NEPA Review Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

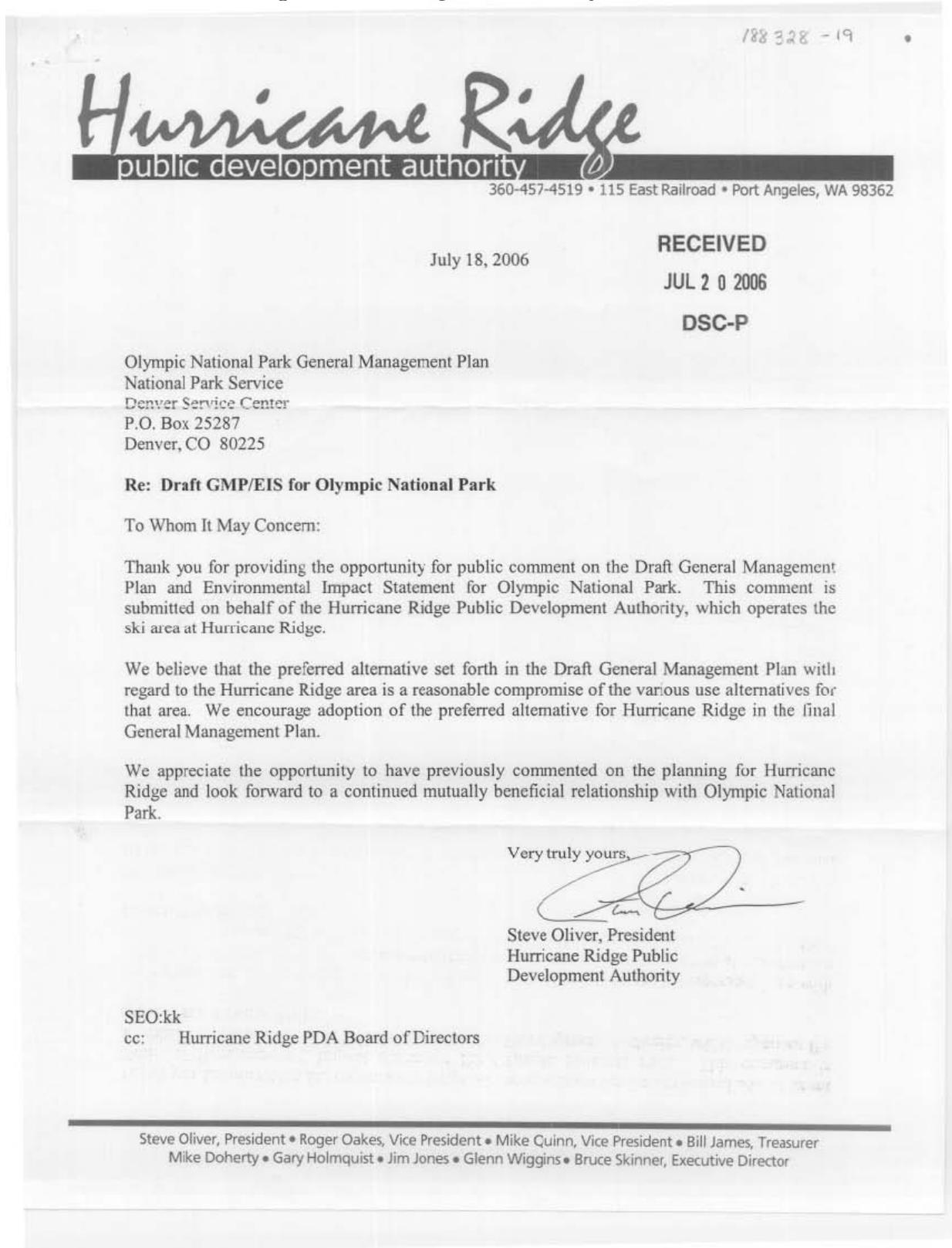
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

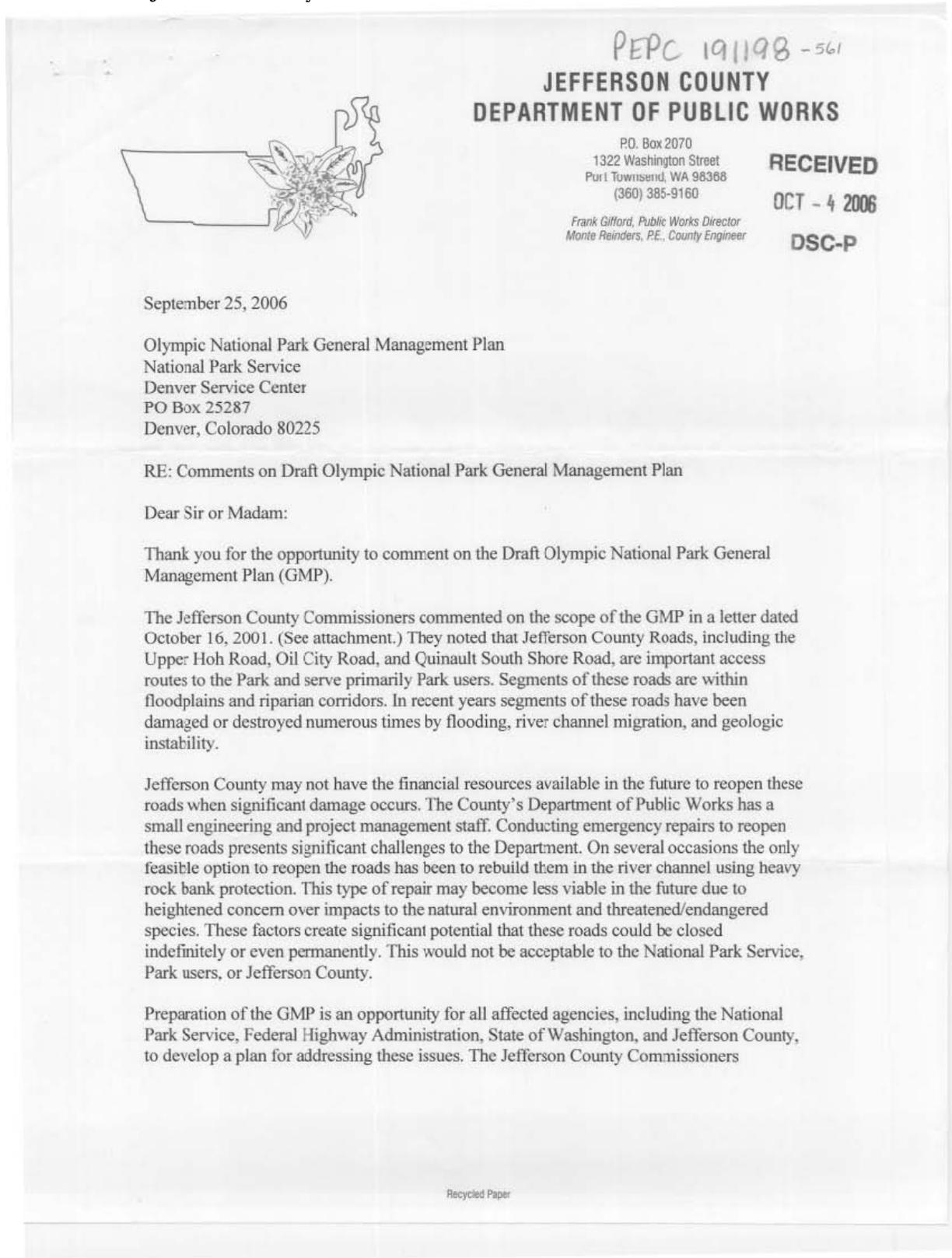
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

Comment 19-Hurricane Ridge Public Development Authority



Comment 561-Jefferson County



therefore requested that the GMP address the following specific issues related to Park access over County Roads:

- Assess the existing access routes and identify areas that are at risk due to flooding, river migration, geologic stability, and other factors;
- Identify appropriate alternative routes for relocating these roads;
- Identify appropriate agencies responsible for the design and construction of alternative routes and the ongoing maintenance and repair of the Park access roads; and
- Identify Federal funds for relocation, maintenance, and repair of these roads.

After review of the Draft GMP, the Public Works Department has concluded that the GMP does not address these issues.

The GMP Alternatives address the issues of Park roads and facilities in flood plains, riparian corridors, and geologically unstable areas within the Park. Preferred Alternative D states "Roads might be modified or relocated for resource protection and/or to maintain vehicular access...." (Page 68.) Alternatives C and D propose modifications to visitor access, including moving access roads out of the river meander zone. Alternatives B, C, and D consider relocating the Hoh Rain Forest Visitor Center adjacent to the Park boundary or outside of the Park, because of potential damage to the Hoh River Road within the Park. Yet these alternatives do not address impacts to Park access from damage to the Upper Hoh County Road outside of the Park. Alternatives B, C, and D propose to maintain the Quinault Lake Loop, yet they ignore the issue of maintaining the 4.1-mile Quinault South Shore County Road segment of that loop.

The GMP fails to consider that proposed actions to maintain access within the Park would be negated if County Roads providing access to the Park are damaged or destroyed and Jefferson County is unable to repair or relocate them. The GMP fails to address the need to plan for, finance, and relocate vulnerable County Roads that provide Park access.

I strongly urge the Park Service to revise the GMP to address these issues as requested by the Jefferson County Board of Commissioners in their letter of October 16, 2001.

Sincerely,



Monte Reinders, PE
Jefferson County Engineer

Cc: Jefferson County Board of Commissioners
John Fishbach, County Administrator
Frank Gifford, Public Works Director



1820 Jefferson Street
P.O. Box 1220
Port Townsend, WA 98368

Dan Titterness, District 1 Glen Huntingford, District 2 Richard Wojt, District 3

October 16, 2001

National Park Service
Denver Service Center
Planning and Design Services, Cliff Hawkes
PO Box 25287
Denver, Colorado 80225-9901

RE: Olympic National Park General Management Plan

Dear Sir:

Thank you for the opportunity to participate in the Olympic National Park's General Management Plan.

A significant portion of the Olympic National Park is located within Jefferson County. Some of the most important Park access roads are County Roads, including the Upper Hoh Road, Oil City Road, and Quinault South Shore Road. Some segments of these roads are within the riparian corridor of these rivers. Some segments also adjoin Wilderness Areas. In recent years these roads have been closed numerous times due to flooding, migration of the river channel, and geologic instability. On several occasions the County's only feasible option to reopen the roads has been to rebuild them in the river channel using heavy rock bank protection. This type of repair may no longer be an option due to the requirements of the Endangered Species Act and concerns by Native American Tribes that these activities may impact treaty fisheries resources.

There is a significant possibility that one or more of these roads could be closed and there would not be an environmentally acceptable solution to reopen them in a timely manner. This is obviously not an acceptable situation for Jefferson County, the National Park Service, or Park users.

Repairing damage to Park access roads has significantly depleted the County's Road Fund and impacted the County's ability to fund other County Road projects. Because the County's Department of Public Works has a relatively small engineering and project management staff, conducting emergency repair work on these roads has also diverted the Department's personnel from other priority County projects.

Phone (360)385-9100 / 1-800-831-2678 Fax (360)385-9382 jeffbocc@co.jefferson.wa.us

National Park Service Letter

October 16, 2001

Page: 2

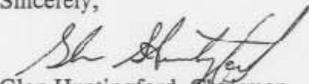
It is neither fair nor prudent for the Park Service to continue to rely on the capacity of Jefferson County to maintain these access roads. Preparation of the Park General Management Plan is the ideal opportunity for all affected agencies, including the Park Service, Federal Highway Administration, the State of Washington, and Jefferson County, to assess this situation and develop appropriate solutions.

In order to achieve this goal, the Management Plan should address the following specific issues related to Olympic National Park access over Jefferson County Roads:

- ◆ Assess the existing access road routes and identify areas that are at risk due to flooding, river migration, geologic stability, and other factors
- ◆ Identify appropriate alternative routes for relocating these roads
- ◆ Identify appropriate agencies responsible for the design and construction of alternative routes and the ongoing maintenance and repair of the Park access roads
- ◆ Identify Federal funds for relocation, maintenance, and repair of these roads

We look forward to discussing these issues with the Park Service during the development of the Management Plan.

Sincerely,


Glen Huntingford, Chairman

cc: Senator Patty Murray
Representative Norm Dicks

Comment 457-Olympic Coast National Marine Sanctuary

SEP-29-2006-FRI 04:31 PM Olympic Coast NMS

FAX No. 1 360 457 8496

P. 002

PEPC 190955-457



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
OFFICE OF OCEAN AND COASTAL RESOURCE MANAGEMENT
Olympic Coast National Marine Sanctuary
115 East Railroad Avenue, Suite 301
Port Angeles, WA 98352-2525

September 29, 2006

Olympic National Park General Management Plan
National Park Service
Denver Service Center
P.O. Box 25287
Denver, Colorado 80225

We appreciate this opportunity to provide comments on Olympic National Park's (ONP) Draft General Management Plan/Environmental Impact Statement (DGMP/EIS). The Olympic Coast National Marine Sanctuary (OCNMS) is one of fourteen marine protected areas managed by the National Oceanic and Atmospheric Administration's National Marine Sanctuary Program. While there are differences in our enabling legislation and in our programs, the similarities are more relevant to our comments.

The Olympic Coast National Marine Sanctuary was designated, under the authority of the National Marine Sanctuary Act, in 1994. The designation document states the purpose of designation as protecting and managing the conservation, recreational, ecological, historical, research, educational, and aesthetic resources and qualities of the Olympic Coast National Marine Sanctuary. Olympic National Park was very involved in the designation process of the sanctuary, and since that time our two sites have enjoyed a very positive relationship. Olympic National Park participates on our Advisory Council, providing OCNMS with advice on management issues. This Advisory Council includes a broad representation from federal, state, local, tribal governments and constituent groups. Other areas of collaboration have included OCNMS support for coastal interpreters, shared training opportunities for resource protection and interpretive staff, cooperative efforts for oil spill response planning, OCNMS support for marine debris removal, interpretive facilities planning, and intertidal monitoring. There have been several other areas of collaboration that have been discussed, but not implemented due to limited resources. As the Park moves forward to implant their General Management Plan, we hope to continue and enhance this partnership.

There are a number of areas in the DGMP/EIS, where additional references to the marine areas adjacent to ONP may be mentioned. For instance the "Regional Context" of the document references the management of adjacent terrestrial areas, but does not mention the management of adjacent marine areas. There are a number of "Parkwide Policies and Desired Conditions" (including associated strategies) that could also be expanded to explicitly include marine areas. For instance the "Natural Soundscapes" section could



include, supporting OCNMS's overflight restrictions as a strategy. Additional policies that could be expanded to be more specific to the park's coastal strip and adjacent marine areas include; ecosystem management, water resources, native species, and exotic species.

In general terms, in the areas of direct interest to OCNMS, we support the preferred alternatives, in particular those dealing with the intertidal areas of Olympic National Park. OCNMS and ONP have shared management responsibility for the intertidal area of the park's coastal strip, specifically the sanctuary's boundary extends shoreward to the mean higher high water line where adjacent to federal lands, and the park's boundary extends to mean lower low water on the coastal strip. Since the sanctuary's designation this overlapping, or intertidal, area has been the subject of much discussion.

In response to concerns shared by ONP and OCNMS managers, a Marine Conservation Working Group (MCWG) was established by the OCNMS Advisory Council in early 2000 to evaluate the issue of marine zoning as a management tool, to make specific recommendations on the status and effectiveness of existing zoning, and to develop an intertidal zoning strategy. The study area was federally owned intertidal shoreline where OCNMS and ONP share jurisdiction, tribal reservation areas or State lands were not included. Representatives from 14 groups, including tribal, federal, state and county governments, and the commercial fishing, conservation and scientific communities, were invited to participate in the MCWG. Sixteen meetings were held between April 2000 and October 2003. Various representatives attended meetings and contributed at differing levels throughout the process. Over the course of three years, this working group listened to regional experts on oceanography, nearshore and intertidal ecology, and resource management, reviewed information on visitation and use of the marine shores, studied findings of human impacts at other shorelines from the U.S. and throughout the world, and reviewed a range of management measures implemented to control and minimize human impacts on intertidal natural resources and habitats. The recommendations developed by the MCWG agree well with the park's preferred alternative. We believe these recommendations are well founded and are the basis of wise and appropriate management for these marine shores. We recommend Olympic National Park keep the intertidal reserve zones in the final general management plan.

Language associated with the use of intertidal reserves and intertidal reserve zones should be consistent with other use of "zone" and should be edited to reduce confusion and misinterpretation, for example:

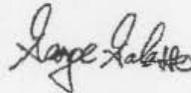
Table 1, p. 57 – to avoid confusion, there should be consistent use of the term "intertidal area" where appropriate and exclusive use of the term "zone" in the phrase "intertidal reserve zones". Part of the confusion results from common use of the phrase "intertidal zone" by ecologists/biologists. In the DGMP/EIS, the intertidal reserve zone is a zone type with several areas of designation. However, a casual review of Table 1 might lead a reader to think this zone type is recommended for all intertidal areas in the park. In the "Zone Concept" row, a suggested edit is "The park's intertidal area reserve-zone ... is an ecologically



critical area that sustains diverse assemblages... Selected coastal and intertidal areas within the park would be designated as intertidal reserves zones to protect these highly diverse communities in these zones."

The Olympic National Park may also want to consider including management options for the intertidal areas surrounding the islands of the Washington Islands National Wildlife Refuge. While the upland areas are under the jurisdiction of the Washington Islands National Wildlife Refuge, it is our understanding that the park's jurisdiction includes the intertidal areas of these islands. While mentioned in Appendix C, the DGMP/EIS does not appear to include any management options for the offshore islands. Human access to refuge portions these islands is prohibited in recognition of their unique values to seabirds and marine mammals. However, the refuge's no-access buffer around the islands is a recommendation, not a regulation. It is our understanding that under current park management, the intertidal portions of the islands have management consistent with the mainland shore. Visitors could land on in intertidal area; this appears to be a loophole that the park may consider reviewing in consultation with the Refuge Manager.

Sincerely,



George Galasso, Assistant Superintendent
Olympic Coast National Marine Sanctuary



Comment 265-Olympic Region Clean Air Agency

PEPC 190701-265

Olympic National Park Draft General Management Plan

National Park Service
U.S. Department of the Interior



Summer 2006

COMMENT SHEET ONP-GMP

We welcome your comments on this project. The comment period closes on 09/15/2006. Your comments must be delivered or postmarked no later than 09/15/2006.

You may complete this form and provide it to the NPS at one of the open houses, or you may send this form and/or your letter to:

National Park Service
Denver Service Center - Cliff Hawkes, DSC-P
12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225-9901

Is the practice of the NPS to make comments, including names, home addresses, home phone numbers, and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives of or officials of organizations or businesses, available for public inspection in their entirety

* indicates required fields

Personal Information

First Name: * RITA Middle Initial
Last Name: * CIRULIS
Organization: OLYMPIC REGION CLEAN AIR AGENCY
Address 1: * 116 W. 8th ST. #113
Address 2:
City: * PORT ANGELES State/ Province* WA
Postal Code: * 98362
E-mail: rita@orcaa.org

Keep my contact information private. Provide justification:

Please use below and the back of the paper for your comments. Attach extra sheets as necessary. Please print or write clearly.

NOT ONLY WOULD THE CONGESTION AT HURRICANE RIDGE
BE REDUCED, AIR QUALITY RESOURCES COULD BE BETTER
MANAGED IF THE PUBLIC TRANSIT /SHUTTLE OPTIONS
ARE IMPLEMENTED

Comment 453-Port of Port Angeles



PEPC 190951 - 453

RECEIVED
OCT - 4 2006
DSC-P

September 21, 2006

Mr. Bill Laitner, Superintendent
Olympic National Park
NPS Denver Service Center – Planning
P.O. Box 25287
Denver, CO 80225

Re: Olympic National Park
Draft General Management Plan
Environmental Impact Statement

Dear Mr. Laitner:

The purpose of this letter is to place on the record the comments of the Port of Port Angeles (POPA) regarding subject Draft General Management Plan for the Olympic National Park (ONP). As background, POPA was established in 1923 to provide marine terminal facilities to support economic development on the North Olympic Peninsula. The Port has become the leading economic development agency in Clallam County.

POPA certainly comprehends the importance of resource protection for ONP, and many aspects of the Plan are visionary and commendable. However, the Port has a legislated mandate to promote economic development. In the case of our community, economic development is primarily reflected in protecting and expanding the increasingly challenged employment base in Clallam County; i.e., sustainable family wage jobs. Therein lies the conflict. The Port has serious concerns that the draft plan fails to adequately take into account the true long term direct negative impacts of changing ONP boundaries while failing to make the case that significant improvement in ecological protection will be achieved. For example, on page 372, the Draft Plan reads in part as follows:

Proposed Additions to the Park Boundaries and Other Adjustments.

Under Alternative – D (Preferred Alternative) three areas totaling approximately 16,000 acres, would be added to the boundary of the Park:

- Queets – 2,300 acres
- Lake Crescent – 1,640 acres
- Ozette – 12,000 acres

In addition, approximately 44,000 acres of land in the Lake Ozette watershed would be acquired outside the boundaries of ONP and exchanged with the State of Washington Department of Natural Resources to be managed under the “Legacy Forest” concept.

338 West First Street
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Port Angeles, WA 98362

(360) 457-8527
Fax: (360) 452-3959
info@portofpa.com

COMMISSIONERS
John M. Calhoun
W. M. “Bill” Hannan
George H. Schoenfeldt

EXECUTIVE DIRECTOR
Robert E. McChesney

Mr. Bill Laitner
09/21/06 – page 2

These proposed modifications to ONP boundaries would have the effect of removing valuable timber acreage from commercial harvest. This would have a devastating long term impact on the local timber industry and would permanently eliminate many job opportunities. Our North Olympic Peninsula Community simply cannot absorb these losses and the Port strongly opposes the suggestion.

Further, the economic impact analysis that would support many of the proposed changes appears to be insufficient. Expanding Park boundaries will be detrimental to the commercial timber industry. For example, the jobs categories illustrated in Tables – 17 and 18 (pgs. 168-169) grossly understates the true jobs impacts in both raw numbers of jobs as well as their annual earnings. We know from our own payroll sheets that many workers participating in the timber supply and logistics chain make annual salaries far in excess of the \$18,636/year shown in Table-17. Consequently, we dispute their validity.

Significant gains in ecological protection through expanding Park boundaries into commercial timber lands are questionable and speculative compared to the measurable reductions in economic activity that will occur. Washington State recently adopted Forest Practice Rules which the federal agencies recognized as providing long term protection to aquatic species. The acceptance of the State programmatic Habitat Conservation Plan under the Federal Endangered Species Act should reassure the Park that Park resources will be protected from neighboring commercial forest activities. Clearly, expanding Park boundaries are not necessary to protect sensitive resources.

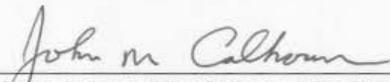
POPA appreciates the opportunity to comment on the proposed Draft General Management Plan for ONP. The Park is an important public asset. We should find ways to make it better but without putting other hard working families in worse circumstances because of it.

Sincerely,

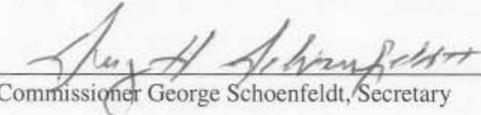
PORT OF PORT ANGELES



Commissioner Bill Hannan, President

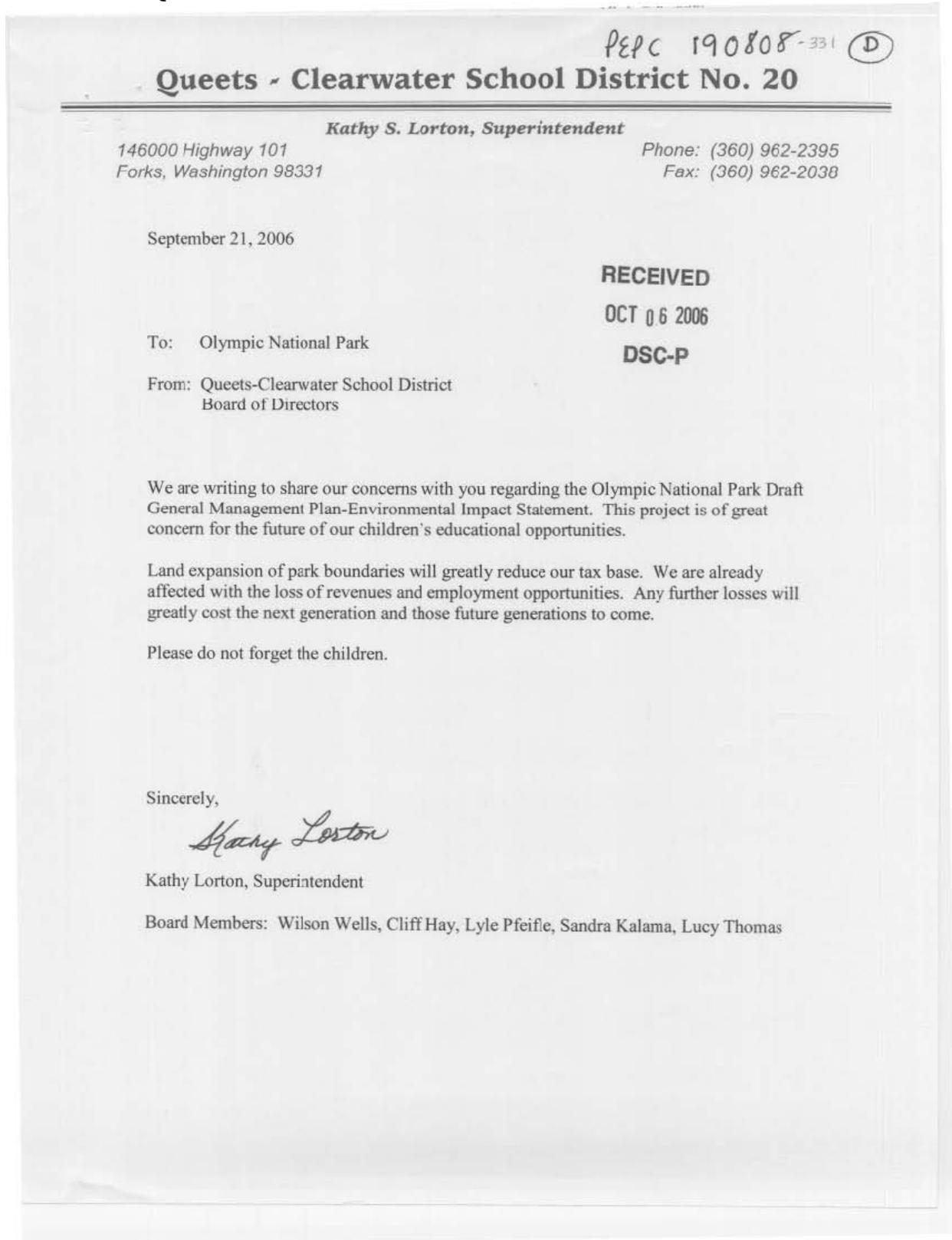


Commissioner John Calhoun, Vice President

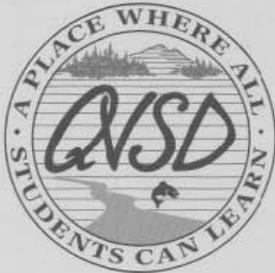


Commissioner George Schoenfeldt, Secretary

Comment 331-Queets Clearwater School District



Comment 577-Quillayute Valley School District



RECEIVED PEPC 19/218
OCT - 4 2006 577

QUILLAYUTE VALLEY SCHOOLS
Office of Superintendent

September 27, 2006

Carla McConnell
Olympic National Park - GMP
National Park Service
Denver Service Center - Planning
PO Box 25287
Denver, CO 80225

Dear Miss McConnell,

Schools and communities depend upon a healthy economic base, and a stable tax base. The Olympic National Park General Management Plan threatens both. The acquisition of productive land, the change in status of Trust Lands to Legacy Forest Lands, and the restriction placed on property by wild and scenic designation are not in the best interest of our communities, schools, or students.

School funding is driven by school enrollment and the passage of maintenance and operation levies and school bonds. A loss of timberlands and the restrictions put on other lands would result in the loss of local jobs. For example, alternative B calls for the removal of Kalaloch Lodge with the immediate loss of 60 paid employees and the trickle down from the lost revenue would hurt all of the local businesses.

We are a property tax poor district. Any additional cuts in private property would severely hamper the school district's ability to pass levies and bonds. The removing of lands that generate timber excise tax and taking those lands off the tax rolls would cut like a double-edged sword. The timber excise tax reduces the amount property owners pay per thousand dollars of assessed value. Taking land out of private ownership would increase the amount of taxes the remaining private land owners must pay for the district to generate the same dollar amount.

The Board of Directors of Quillayute Valley School District is against expansion of Olympic National Park, and/or additional restrictions on state or private lands other than those regulations already in place. The Board of Directors approved these comments at the regular board meeting on September 26, 2006.

Sincerely,


Dave Dickson
Chairman, Board of Directors

Quillayute Valley School District Number 402

Post Office Box 60 • Forks, Washington 98331-0060 • Phone (360) 374-6262 • Fax (360) 374-6990

Comment 439—Representative Jim Buck

PEPC 190937-439



"Buck, Rep. Jim"
<Buck.Jim@leg.wa.gov
>
Sent by: "Weeks,
Brenda Lee"
<Weeks.BrendaLee@le
g.wa.gov>

To: <olym_gmp@nps.gov>
cc:
Subject: Olympic National Park Draft General Management Plan

09/28/2006 03:00 PM
MST

September 29, 2006

Olympic National Park General Management Plan
National Park Service
Denver Service Center
P.O. Box 25287
Denver, Colorado 80225

Fax: 303-969-2736
Email: olym_gmp@nps.gov

RE: Olympic National Park Draft General Management Plan

Dear Park Service:

We have recently become aware of the Park Service's proposal to update its General Management Plan. We appreciate public processes, and know first hand about the need to balance multiple values and viewpoints. We also appreciate locally developed plans for managing natural resource issues, and feel that agreements developed by collaboration with interested stakeholders are the best way to develop lasting solutions. We understand that the park has hosted several open houses and is now accepting public comment on its Management Plan. The purpose for our writing is to make the Park aware that preferred alternative "D" includes annexation of private forestland, and removal of a substantial amount of commercial timberland from the economic base, in order to protect public resources, without acknowledging the plans that Washington has already put into place to address these issues.

One of the things that we as Legislators are most proud of is our 1999 sponsorship, of ESHB 2091, the Forests & Fish Law. The bill, which was supported by a 2/3rds bi-partisan majority of the state Legislature, addressed protection of clean water, salmon and aquatic habitat, and resulted in a 50-year Habitat Conservation Plan (HCP), encompassing 9.3 million acres of private and state forestland. The Forests & Fish Law resulted from a science-based forest management plan developed by more than 140 individuals, including 34 federal, state, county, tribal and industry scientists who worked together for 18 months.

After a decade, the federal government approved the HCP acknowledging that forestry practices in Washington State are protective of salmon and aquatic habitat. The Park needs to be aware

that we have addressed the protection of public resource concerns here at the state level.

Washington's forestlands now have among the highest level of environmental protection in the United States. The forest products industry is the only sector in Washington that has a salmon recovery plan for protecting fish habitat and water quality, backed up by law. We also have some of the best tree growing country in the world, with our combination of rich soils and wet environment, making the practice of forestry Washington State plain common sense.

It is important that we understand that Washington State has become a leader in its ability to develop local solutions that balance environmental protection and maintain a healthy forest industry.

With this step forward in resource protection, Washington State becomes the leader not only for environmental protection, but also for its ability to find solutions that balance the protection of our precious natural resources while producing the forestry products that we all use every day.

Removing another 60,000 acres of commercial forestland from the Peninsula will affect local communities by removing about a year's worth of sustainable harvest volume from the timber basket, in an area that has already suffered economic hardship through the disruption of federal forest policies of the early.

We encourage the Park to remove the boundary expansion proposal in its preferred alternative "D" and acknowledge the accomplishments made for resource protection here at the local level.

Sincerely,

Representative Jim Buck
24th Legislative District

Comment 485—Representative Lynn Kessler

191003-485

September 29, 2006

Olympic National Park General Management Plan
National Park Service
Denver Service Center
P.O. Box 25287
Denver, Colorado 80225

Fax: 303-969-2736

Email: olym_gmp@nps.gov

RE: Olympic National Park Draft General Management Plan

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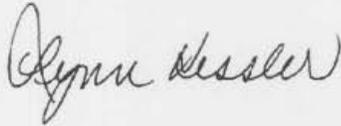
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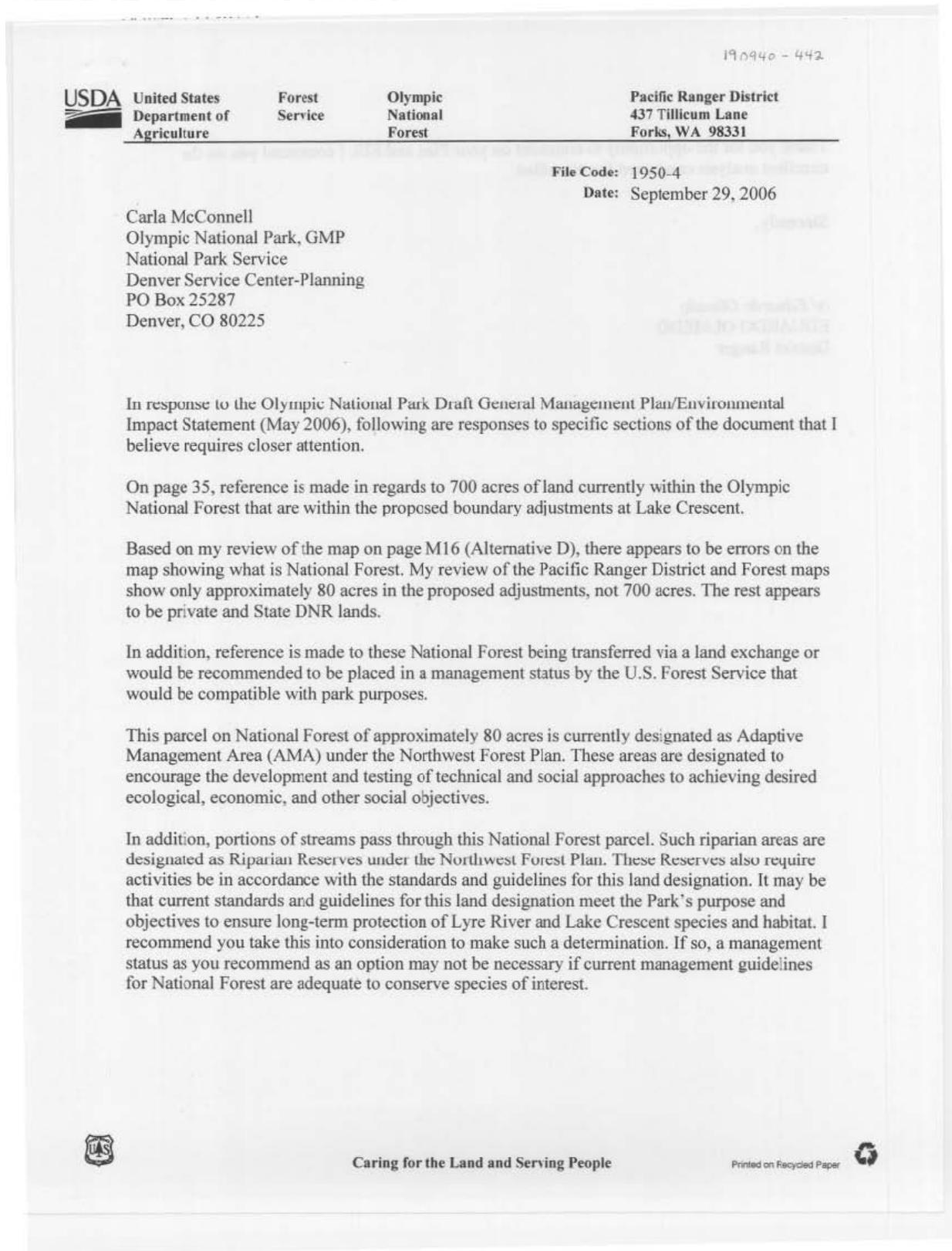
We encourage the Park to remove the boundary expansion proposal in its preferred alternative "D" and acknowledge the accomplishments made for resource protection here at the local level.

Sincerely,

A handwritten signature in cursive script that reads "Lynn Kessler". The signature is written in dark ink and is positioned above the typed name.

Representative Lynn Kessler
24th Legislative District

Comment 442–United States Forest Service

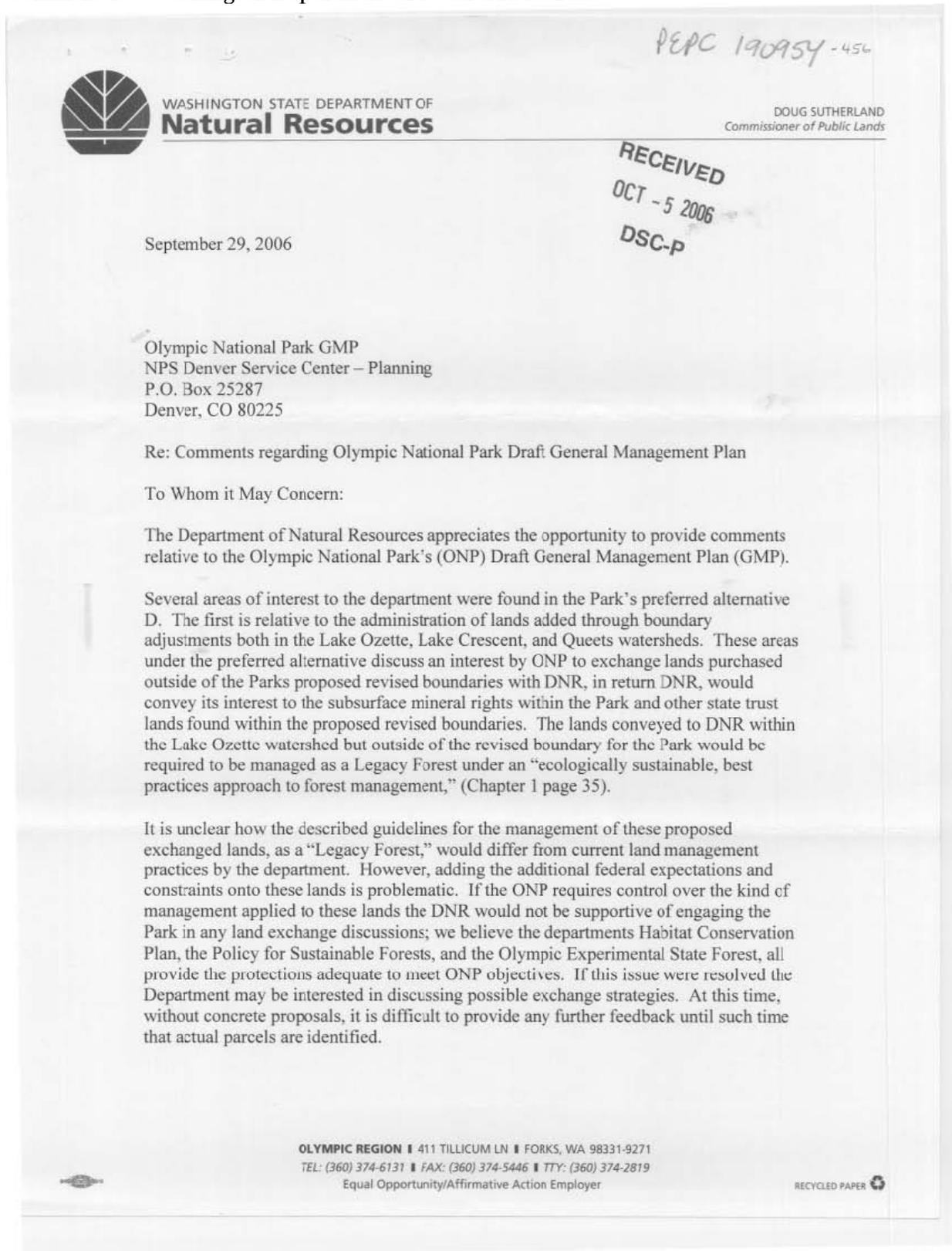


Thank you for the opportunity to comment on your Plan and EIS. I commend you on the excellent analysis conducted for this effort.

Sincerely,

/s/ Eduardo Olmedo
EDUARDO OLMEDO
District Ranger

Comment 456–Washington Department of Natural Resources



Olympic National Park GMP
September 29, 2006
Page 2 of 3

We also have some concerns regarding the proposed exchange of subsurface mineral rights for surface rights. The state has statutory limitations on the disposition of these mineral rights, and historically has only executed exchanges of mineral rights when it has been for similar or equal mineral rights. In addition, each parcel of state trust land is designed and managed for a particular trust, with various provisions and exclusions relating to the sale, transfer or exchange of certain trust lands. The exchange of mineral rights as well as surface lands managed for specific trusts, and establishment of a new Legacy Trust, would very likely require legislative action.

A second area of interest is found in Alternative D relative to the proposed relocation of the portions of Highway 101 in the Kalaloch area. The proposal recommends the relocation of Highway 101 “out of the park to address threats from coastal erosion and to enhance visitor experience.” DNR trust lands abut much of ONP lands in this area and potentially would be significantly impacted by this proposal. The department needs to be engaged in any proposals that affect state trust lands very early in any planning stages relative to the relocation of Highway 101.

Thirdly, the preferred alternative D calls for including several thousand acres of what is now commercial forestland within the boundary of the Park. It is not clear how the enforcement of the states Forest Practice Act on those lands would be regulated prior to actual purchase by the Park. Forest Practice activities within the park boundary would fall under a Class 4-Special application requiring additional review under the State Environmental Policy Act (SEPA). There currently are provisions for the Park Service to administer similar activities, which occur on private in holdings near Lake Crescent and Lake Quinault. DNR would like clarification as to the parks future plans for forest practice administration in these areas.

We would also like to point out an incnsistency in the discussion of rare plant species in the Park. On page 108, under the discussion of Special Status Species, reference is made to a complete list of federal and state special status species in Appendix G. However, no plants are included in this appendix. Also, the short list of USFWS Species of Concern is incorrectly labeled as “Species of Special Concern,” and the list of Washington Natural Heritage Program – Listed Threatened Species includes two species that are currently on our Review List 2, one sensitive species, and one scientific name that is no longer recognized (*Astragalus australis* var. *olympicus* was previously named *A. cottonii*, but this name is no longer considered valid). These errors are most likely due to referring to the 1997 Natural Heritage list, which has subsequently been revised. The best source of current status and nomenclature for these species can be found on the Natural Heritage Program webpage at www.dnr.wa.gov/nhp.

A potentially more important omission is that plants with special status in the state are present in the Park, could be impacted by Park activities, but are not included in this

Olympic National Park GMP
September 29, 2006
Page 3 of 3

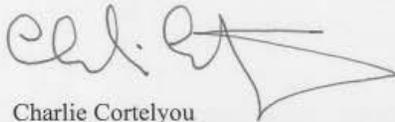
analysis. We recommend that the analysis of effects include all species that are assigned special status by the Natural Heritage Program.

Lands identified in alternatives B-D at the south end of Lake Ozette include the proposed Bite Hill Natural Area Preserve (NAP). The Washington Natural Heritage Advisory Council recommended and the Commissioner of Public Lands approved the proposed Bite Hill NAP in 1992. The proposed area includes both state trust land (Common School trust) and private land.

The department is additionally exploring ways to protect lands within the South Lake Ozette watershed securing a connection between the current National Park coastal strip and the Bite Hill NAP.

Thank you again for the opportunity to provide comment to the parks plan. The department respects the efforts of the ONP to protect the environmental values and to provide for enhanced opportunities for public enjoyment of these special lands on the Olympic Peninsula. These efforts can be compatible with the department's mission of providing sustainable economic, environmental, and social benefits to the citizens of Washington State.

Sincerely,



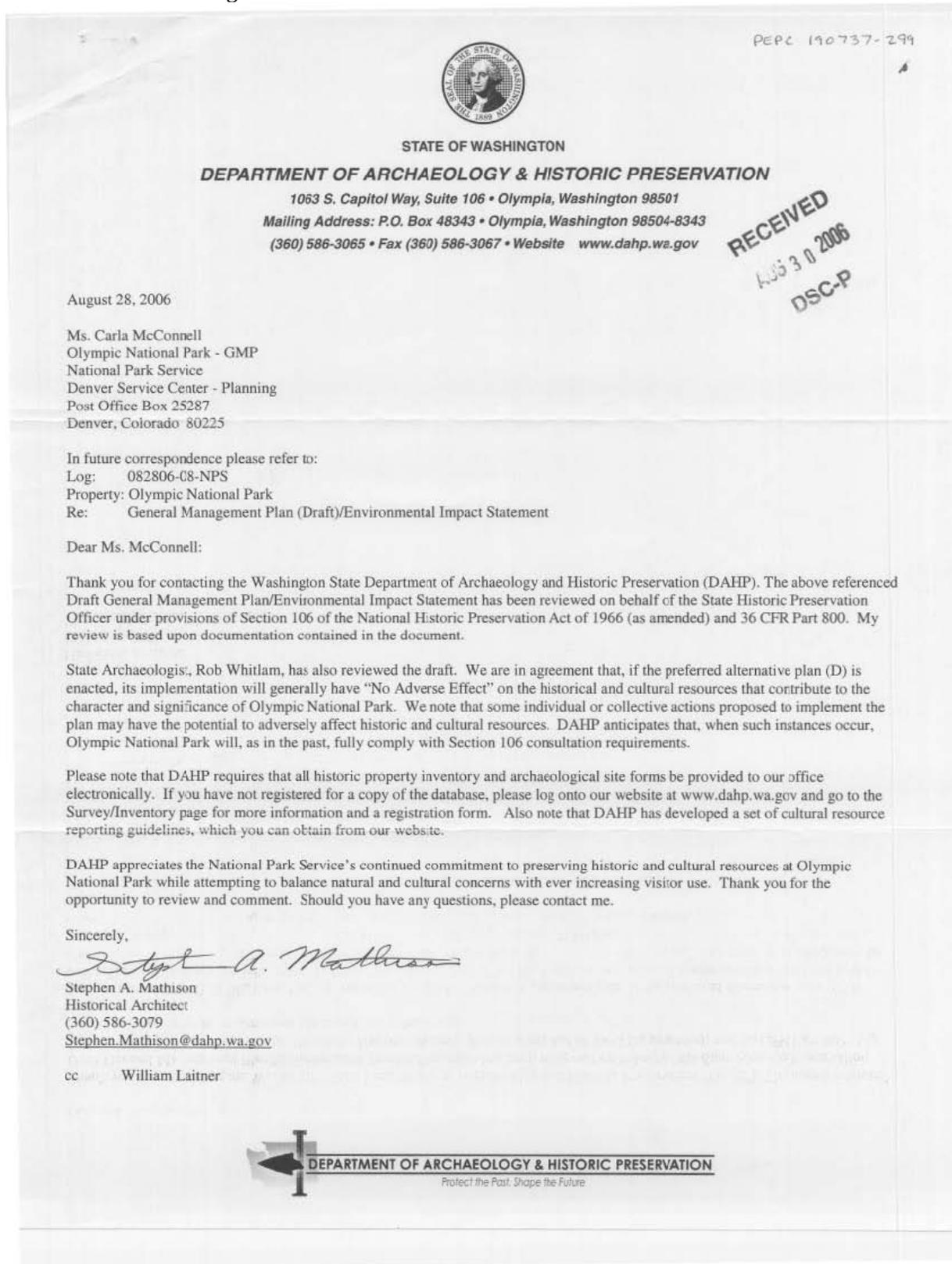
Charlie Cortelyou
Olympic Region Manager
Washington State Department of Natural Resources

cc: Doug Sutherland, Commissioner of Public Lands
Bruce Mackey, Lands Steward
Bonnie Bunning, Executive Director of Policy & Administration
Kit Metlen, Division Manager, Asset Management & Protection Division
Gretchen Nicholas, Division Manager, Land Management Division
Jed Herman, Division Manager, Product Sales & Leasing Division

Comment 17-Washington Department of Transportation



Comment 299–Washington State Historic Preservation Office



Comment 455-Washington State Historic Preservation Office



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

PEPC 190953-455
190953-455
RECEIVED
09/29/2006

September 29, 2006

Mr. William Laitner
Superintendent
Olympic National Park
600 East Park Avenue
Port Angeles, Washington 98362-6798

In future correspondence please refer to:
Log: 082806-08-NPS
Re: Olympic National Park: General Management Plan (Draft)/Environmental Impact Statement

Dear Mr. Laitner:

On behalf of the Washington State Department of Archaeology and Historic Preservation (DAHP), I want to take this opportunity to follow-up on our letter of August 28, 2006 regarding the Draft Olympic National Park (ONP) General Management Plan & Draft Environmental Impact Statement (DEIS). As stated in our August letter, we concur that Alternative D, the preferred alternative, will have "no adverse effect" on significant cultural resources within the park. Our concurrence is based upon the stated "focus on balancing the protection of natural and cultural resources with improving the visitor experience."

As the ONP implements plans and policies in the GMP, DAHP looks forward to consultation from the National Park Service (NPS) when implementation of a project has potential to affect cultural resources listed in, or eligible for listing in, the National Register of Historic Places. As you know, this consultation is mandated of all federal agencies as a result of Section 106 of the National Historic Preservation Act of 1966 and its implementing regulations as found in 36 CFR Part 800.

We are aware there is concern and confusion as the relationship of the Wilderness Act of 1964 and the National Historic Preservation Act of 1966 (as amended). We wish to note the following.

Section 110 (2) of the National Historic Preservation Act states that:

Each federal agency shall establish (unless exempted pursuant to Section 214) of this Act, in consultation with the Secretary, a preservation program for the identification, evaluation, and nomination to the National Register of Historic Places, and protection of historic properties.

Further the Act requires that:

...such properties under the jurisdiction or control of the agency as are listed or may be eligible for the National Register are managed and maintained in a way that considers the preservation of



their historic, archaeological, architectural and cultural values in compliance with Section 106 of this Act....

As you will note, there is no exemption in this Act that allows Wilderness Areas to take precedence over the preservation of historic properties. Certainly this is evident in Section 4(3) which states:

Nothing in this Act shall modify the statutory authority under which units of the national park system are created. Further the designation of any area of any park, monument, or other unit of the national park system as a wilderness area pursuant to this Act shall in no manner lower the standards evolved for the use and preservation of such park, monument, or other unit of the national park system in accordance with the Act of August 25, 1916....

We also note that some parties have referenced *Wilderness Watch v. Mainella*, 375 F.3d 1085 (11th Cir. 2004), as supporting Wilderness Areas over historic preservation. *Wilderness Watch* did not address the general relationship between the Wilderness Act and the National Historic Preservation Act, and it did not conclude that one Act superseded the other. The issue was whether the National Park Service's use of a fifteen-passenger van to transport visitors through a Wilderness Area to a historic site was "necessary to meet minimum requirements for the administration" of the historic area under the Wilderness Act. The court concluded the Wilderness Act unambiguously prohibited the Park Service from offering motorized transportation to park visitors through a Wilderness Area. Because the issue involved motorized vehicles rather than historic preservation, the court had no occasion to apply the National Historic Preservation Act. Interestingly, however, the court did note that

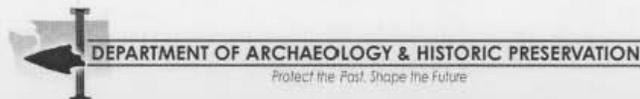
Congress may separately provide for the preservation of an existing historic structure within a wilderness area, as it has done through the NHPA.

The decision in *Olympic Park Associates v. Mainella*, 2005 WL 1871114 (W.D. Wash. 2005), is another in which the court was not faced with a conflict between the Wilderness Act and the National Historic Preservation Act. This office determined that two historic shelters in a Wilderness Area were eligible for listing under the NHPA, notwithstanding the fact they had collapsed in a snowstorm three years earlier. The Park Service proposed to replace them with new shelters constructed elsewhere and flown in. The eligibility for listing was determined based on the perspective of the shelters' original construction and historical use, but held that perspective changed once the Olympic Wilderness was designated. The court held the replacement of the collapsed shelters with new structures violated the Wilderness Act, and it found nothing in the NHPA that authorized the new structures:

[T]he NHPA's goal of preserving historic structures allows for "rehabilitation, restoration, stabilization, maintenance," (16 U.S.C. § 470w(8)), among other things, but it does not require reconstruction. Thus, where the former shelters have been destroyed by natural forces, NHPA does not require reconstruction.

The court did reference the procedural character of the NHPA, noting that it does not forbid the destruction of historic sites nor by command their preservation, but simply orders the government to take into account the effect any federal undertaking might have on them.

It may be significant that the court characterized the Wilderness Act as the specific provision governing the issue, and the National Historic Preservation Act as the general provision. The general rule applied by the courts is that specific provisions prevail over conflicting general provisions, which likely signals that



any conflict between the NHPA and the Wilderness Act would be resolved in favor of the Wilderness Act in any case brought in the federal courts in the Western District of Washington.

I note with concern that a recent decision from California, which relies on both of the cases mentioned above, appears to hold that the Wilderness Act supersedes the NHPA. In *High Sierra Hikers Ass'n v. U.S. Forest Service*, 436 F. Supp. 2d 1117 (E.D. Calif. 2006), the Forest Service sought to repair or rebuild a number of "dam structures" located in a designated Wilderness Area. Several of the structures qualified as historic properties under the NHPA and were eligible for listing on the National Register. The court held that the proposed actions were "clearly and unambiguously contrary to" the provision in the Wilderness Act that prohibits "structures or installations" in Wilderness Areas. After reviewing the decisions in both *Wilderness Watch* and *Olympic Park Associates*, the court concluded:

Absent a declaration by Congress of the need to restore and preserve the dam structures in recognition of their historic significance, there is nothing the court can point to that would authorize such an action where the maintenance of the dams would otherwise come into conflict with the Wilderness Act.

... Here, as in *Olympic Park*, the object of the activity is to perpetuate the existence of structures in a wilderness area....

Here, there is no logical necessity in maintaining, repairing, or operating the dams in order to administer the area for purposes of the Wilderness Act. The area manifested its wilderness characteristics before the dams were in place and would lose nothing in the way of wilderness values were the dams not present. What would be lost is some enhancement of a particular use of the area (fishing), but that use, while perhaps popular, is not an integral part of the wilderness nature of that area.

... The Wilderness Act's prohibition against structures is categorical so far as the court can determine, allowing only those exceptions that are specifically set forth in the Act or in Congress' designation of a particular wilderness area, neither of which apply here.

As you know, the Wilderness Act itself includes a partial exception for units of the National Park System, 16 U.S.C. § 1133(a)(3), under which laws pertaining to historic preservation, including the NHPA, continue to apply in Wilderness Areas so long as they are administered to preserve the area's wilderness character. In our view, this fact distinguishes your proposal from all three of the court decisions references above, because none of those decisions addressed the effect of § 1133(a)(3). Your Draft General Management Plan/Environmental Impact Statement is thoroughly cognizant of the tension between historic and archaeological preservation laws and the Wilderness Act and, in our view, addresses that tension in a way that complies with the Wilderness Act while providing important protection for cultural and archaeological resources in the Park.

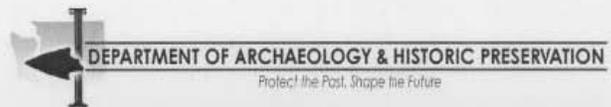
Finally, the concept of a Wilderness as a place without people completely ignores the profound significance of Native American history and culture. We know from Native American testimony, archaeological evidence, and historic documents that people have lived, used and altered the landscapes of all of Washington for the last 12,000 years.





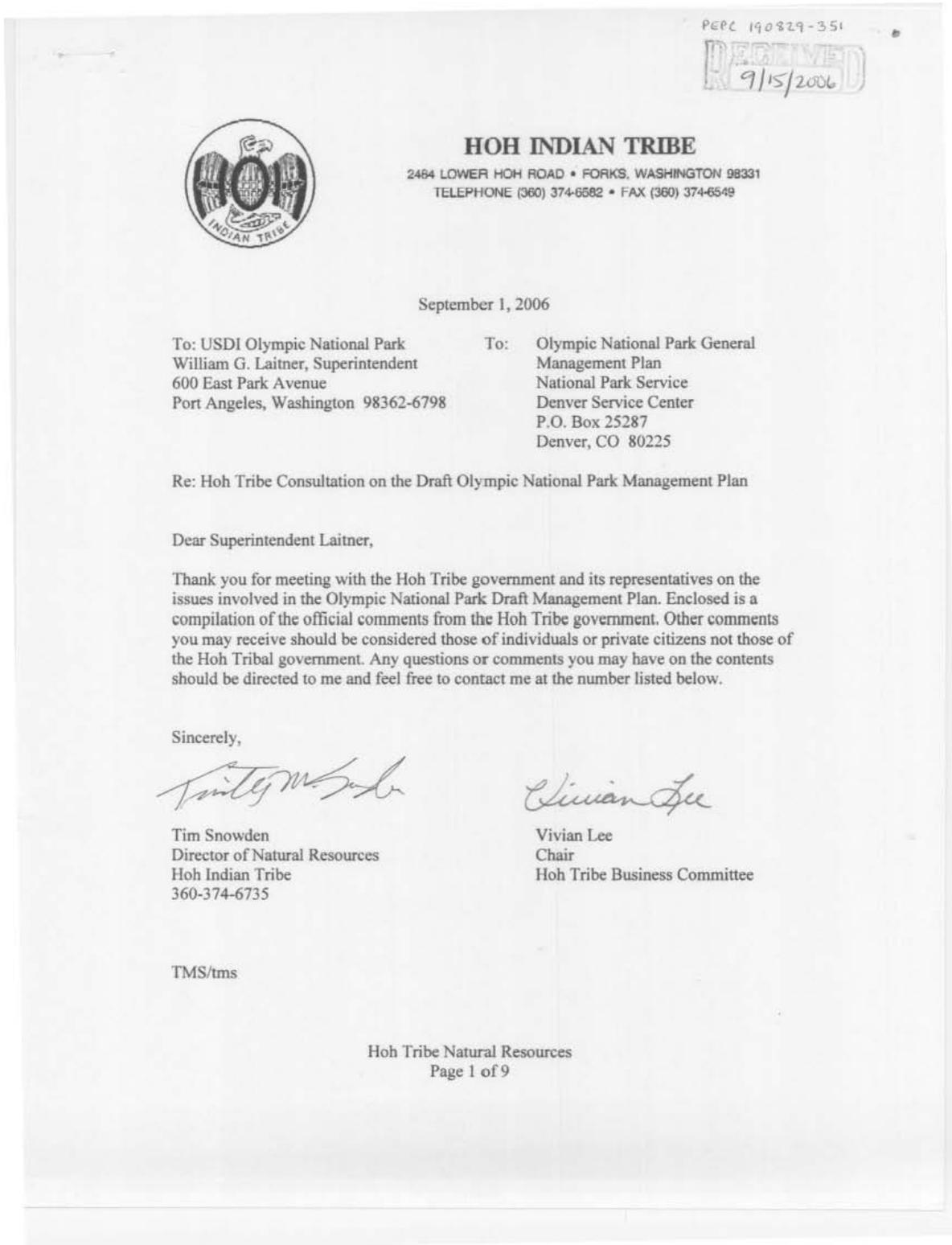
Allyson Brooks, Ph.D
State Historic Preservation Officer
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cc: Stephanie Toothman



Tribal Governments

Comment 351-Hoh Indian Tribe



Hoh Tribe Consultation on Olympic National Park Draft Management Plan

Choice of Alternatives.

As was stated in the meeting of August 16, 2006 the tribe does not take the position of advocating one alternative over another. Instead the tribe will address certain important issues brought up or overlooked by the draft plan. The Deciding Official may incorporate those issues into the Parks' Preferred Alternative.

Ethnographic Representation at the Hoh Rainforest and Kalaloch Visitor Centers.

Geographically, the Hoh Tribe is the most isolated tribe from major employment and population centers. In the Socio-economic section of the Draft, the Hoh Tribe has the distinction of having the highest unemployment rate and lowest per capita income of any other reservation surrounding the Park. The Park mentions at its visitor centers in a number of ways and through literature the Hoh Tribe and its members and their heritage in the area. However, to date there has been no effort by the Park to bring actual Hoh Tribe members into the public awareness at these two visitor centers. The Tribe feels that it would be of great value to the 250,000 plus visitors each year if they were able to meet and speak with a Hoh tribal member at one of these visitor centers. The Tribe feels that there should be at least one full time position at each of these centers, to provide for Native American culture and heritage as it relates to the local environment. The Tribe envisions this as a position that should be funded by the Park Service preferably or perhaps a joint grant obtained between the tribe and the Park, but the position should be a Hoh Tribal, not a Park Service employee. The position would provide long term employment for Hoh Tribal members. While it may be easier to find alternate funding for a youth position, we feel the position should instead be a mature individual that has a background in tribal culture, history, and traditions.

The Park should also work out an MOU with the Tribe on the issue of official Hoh Tribe members selling traditional crafts at the Visitor Centers. The park concessionaires already sell books, stuffed animals, clothing and other tourist items at the centers. The tribal members should be able to sell genuine crafts on a commission basis. There is a huge demand for authentic Native American crafts and this could be a welcome addition to many Hoh Tribal members' incomes. Since the Visitor Centers are in the Hoh Tribe ancestral Usual and Accustomed Area (U & A) it would be appropriate to allow the Hoh Tribe the majority of Native American merchandizing at these locations. It would also allow many of the Park's visitors to obtain genuine tribal artifacts from the resident tribe and would be a win-win situation for both visitors and tribal members.

Cultural Resource materials.

From time to time in the routine course of road, trail, and facility maintenance there are trees that are removed or cut up in the Park. The Tribe is always on the look out for a number of cultural resource natural products including red cedar logs or standing timber and bark. There are a large number of plants, roots, and berries that the tribe uses in cultural practice and would be of interest to tribal members when available.

The Tribe requests that in cases where there are trees or other vegetation that may be usable for tribal crafts and canoe logs, that the Park set up a method for their personnel to contact the tribe for preferential contact and salvage of those items if the tribe is able to.

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The tribe traditionally gathered in areas now occupied by the Park and should be at the top of the list for salvage of materials cut or removed. This would include any hazard tree removal as mentioned in the Cumulative Effects section on page 318.

Wilderness Designation Adjacent to Reservation Boundaries.

The Park land that borders southern and southeastern edges of the Hoh reservation should not be designated wilderness. There should be a buffer zone of low use or front country designation next to the reservation. The reasoning behind this is that the reservation is soon to reach build-out in not too many years. In other words all the available land to build housing on will be built on. That includes the southern and southeastern portions of the reservation. As the land status is now, the reservation will have housing units directly along the border of Park Service Wilderness designated land. This portion of Park will probably receive considerable foot traffic from new housing developments planned on its edge. For ease of future management, a buffer zone of land that is managed for higher human impact and visitation would be more appropriate.

Boundary Adjustments.

The Tribe is very apprehensive of any land acquisition or boundary adjustments to existing Park borders. The Tribe would want to be consulted on a case-by-case basis for any changes in boundaries. There are a number of effects that boundary changes would have on tribal members and the environment that were not mentioned in the potential negative effects portion of the analysis. For instance:

- A change in status of land to the Park from another entity such as state land may effectively change the status of the land from an area that is hunted by tribal members to one that is not. This would effectively be considered a taking from the tribe's treaty rights. The proposed boundary adjustment near the South Fork of the Hoh River in Alternative B is in this category and is opposed by the Tribe.
- The Park would have to detail the impacts of any such activity on the tribe's present transportation system. This includes road closures on non-tribal land that would affect hunting, fishing, or gathering, culvert elimination/replacement, timeframes for the changes so, etc.
- As part of an urgent need to relocate portions of the Hoh Tribe Village due to flood and tsunami danger the tribe has a long term need to acquire more land in proximity to its existing reservation. The acquisitions are fueled by population growth of the tribe, the extreme need for economic development, and the potential for human loss of life and property. Additional Park acquisitions may negatively affect the tribe's ability to acquire land outside its present boundaries.

Relocation of the Upper Hoh Road.

Roads are a major source of water quality problems within the Hoh Tribes U&A, especially those located within channel migration zones and wetlands and on unstable slopes. The ONP needs to make it a high priority to relocate its portion of the Upper Hoh Road to outside of the channel migration zone. The status quo is unacceptable. One needs to quit wasting precious funding on environmentally destructive measures.

Hoh Tribe Consultation on Olympic National Park Draft Management Plan

Our primary concerns regarding the current draft Plan relate back to previous resource issues and management agreements between the Hoh Tribe and the ONP. Previous mitigation agreements have not been honored by the Park that dealt mainly with fish passage (Boundary Pond, Taft Pond and outlet channel, E. and W. Twin Creek culvert replacements) and replacement and maintenance of the primary access (Upper Hoh Road in the vicinity of Boundary Pond) into the Hoh Rain Forest segment of ONP. These unmet agreements have had serious impacts on the fisheries resource within and downstream of the ONP boundaries, impeding access for juvenile and adult salmonids into valuable off channel rearing habitat (Boundary Pond) and potential spawning reaches.

Re-establishment and protection of flood damaged access (Upper Hoh Road) within the Hoh River's active channel migration zone (CMZ) without incorporating fish passable culverts or large woody debris (LWD) bank protection structures into the re-construction design has been totally unacceptable and showed blatant disregard for the native salmon and steelhead stocks that are vital to the economic and cultural survival of the Hoh Tribe as well as a lack of respect for the hydrology and power of the Hoh River. Extensive bank armoring (rip-rap) along the high velocity main stem Hoh River channel adjacent to the re-built road segment has high potential to accelerate channel down cutting and bank erosion both above and below the armored section. Rock armoring creates a relatively frictionless channel surface and minimal energy dissipation, causing extensive bed and bank scour. It is not a long term structural solution for river side roadway protection, i.e. WSDOT 2004 Engineered Logjam Project. From a river ecology/hydrology perspective, rip-rap is one step better than a cement aqueduct.....not a good option.

Considering the almost total lack of successfully implemented salmon habitat enhancement projects within the Hoh Rain Forest segment of ONP even though certain projects were agreed to as mitigation for invasive infrastructure protection/re-construction activities directly impacting the Hoh River, its tributaries, its riparian condition and its valuable and unique fish stocks; the Hoh Tribe should have little to no confidence in any resource management, especially fisheries-related, delineated by ONP in its most recent draft plan.

Increased Visitor Opportunities.

The Olympic National Park has and must continue to play a key role in the stewardship of our lands. Continued improvement in their interpretive and educational programs needs to be a vital part of any future management strategy. Safe guarding the welfare of the park visitors while teaching them how to minimize their footprint on the environment are both paramount to the overall good. The Olympic National Park must lead by example by first correcting existing environmental issues within its present boundaries. They must be proactive by providing additional environmentally sensitive facilities in the front-country and wilderness areas to accommodate the increased demand. Any reduction in visitation facilities would undoubtedly lead to additional camping taking place at unmanaged locations. Invariably, the risk of wildfire, disturbance to plants and animals and pollution/littering problems would all increase. Having personally assisted miss-guided and often ill-prepared tourists, ONP employees should refrain or at least

Hoh Tribe Consultation on Olympic National Park Draft Management Plan

greater discretion before directing park visitors to primitive camping locations outside of the park when park facilities are filled to capacity.

Pg. 16, Ecosystem Management, Desired Future Conditions.

The Park thus far has not had a very good record in making and keeping cooperative partnerships and agreements with the tribe. The tribe is very interested in working with other resource co-managers in the tribe's U & A.

Pg. 21, Marine Resources, Strategies.

The tribe is very interested in acquiring data that the Park is using to determine baseline conditions and the Park should consult with the Tribe on the suitability of data used for such purposes in all environments, not just the marine environment.

Pg. 28, Archeological Resources, Strategies.

Add; work with the Tribe in identifying and protecting archeological sites within the Tribe's U&A.

Provide Hoh Tribe member staff to educate visitors to the Park on archeological and cultural sites in the area.

Pg. 30, Cultural Landscapes, Desired Future Conditions.

What are the Park's management plans for the Oil City in holdings? Are these going to be acquired by the Park?

Is cultural resource staff available for assistance to tribal personnel for joint cultural projects?

Pg. 31, Ethnographic Resources, Strategies.

Strategies, provide for a Hoh Tribe staff member to provide visitor cultural information at the Kalaloch and Hoh Rainforest Visitor Centers.

Pg. 41, Tribal Relations

Add,

3. How can the Park work to improve tribal member opportunities in the Park?

4. How can the Park work to ensure treaty rights for tribal members?

Pg. 47, Impact Topics Dismissed From Further Consideration - Environmental Justice.

The Tribe disagrees with the Park's dismissal of Environmental Justice requirements. The proposed changes of land status may have a disproportionate effect on members of the Hoh Tribe who are minorities and of a low income community. The Park should consider the effects of land changes to tribal member treaty rights and economic ability. The Park should also take this into account in the omission of hiring any Hoh Tribe members to staff the visitor centers at Kalaloch and Hoh Rainforest. There are a number of proposed actions which may impact the tribe and the Park should consider and analyze those impacts in regards to the effects on tribal members and the community.

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Pg. 76, Wetlands

The Park should partner with the tribes to obtain funding for wetland regeneration and protection in lands outside the Park. These areas between the upper sections of the Park and the Coastal sections are still important, especially regeneration wetlands that may feed the water table to Park lands below.

Pg. 76, Vegetation

The Park should also partner with the Tribe on noxious weed control in the drainage since the Park may have infestations on either side of lands that the Tribe is doing control operations on.

Pg. 77, Fish and Wildlife

Consultation on projects in essential fish habitat need to be with the tribe as well as NOAA.

Pg. M30, Alternative B Map

Item 5. The transit system does not mention what would be the protocol for tribal members in accessing the area. Would they be allowed to access areas by vehicle that tourists would not?

Item 6. As stated elsewhere, the boundary adjustment as drawn in the alternative would be highly contentious and the tribe would vigorously oppose the idea.

Pg. M32, Alternative D Map

Item 2. Any modifications to the river need direct consultations with the tribe. As a rule, the tribe discourages additional impacts on the habitat for the tribe's fishery resource. The tribe favors removing long term impacts to the fishery resource and potential impacts, such as roadways, out of the river channel migration zone to protect the resource long term.

Pg. M36, Kalaloch Alternative D Map

Item 2. The Hoh Tribal members need to have vehicle access to the clam beaches for subsistence gathering year round.

Items 4 and 5. As mentioned previously, any cedar logs or other cultural use materials generated by new campground, roadway or structure relocation should be offered to the Hoh Tribe for salvage before they are put to other uses.

One must seriously question the desire of the ONP to have Highway 101 re-routed to the east of Kalaloch. Especially since members from several tribes will still need to a vehicle access to the trails leading to the various beaches. There are presently fish passage problems related to Highway 101 in the immediate vicinity of Kalaloch that need to be addressed. These problems might be considered insignificant to what might take place if Highway 101 was moved to the east. The by-pass would most likely have to be built through the upper watersheds of Sand, Cedar, Steamboat, Kalaloch and a number of other smaller streams. Portions of the road would have to be constructed on unstable slopes and through wetlands and riparian areas. There would also have to be countless stream crossing. Re-locating Highway 101 to the east of Kalaloch could be viewed as a classic

Hoh Tribe Consultation on Olympic National Park Draft Management Plan

example of two wrongs not making a right and the end result would be a net loss in habitat within the Hoh Tribes U&A.

PP. 87-91 Table 4 Summary of Effects., Chapter 4, Environmental Consequences

The effects on the Hoh Tribe of implementing Alternative C's overall mission of increasing visitation were not adequately reviewed. The Tribe may be impacted in a number of ways including more congestion on roadways, increased competition for natural areas, potential increased disturbance in hunting/gathering areas, and competition for future economic development among others. How will movement of or relocation of Hwy. 101 in the Kalaloch area effect tribal clamming and gathering? How will it affect transportation to major population or business centers?

The Hoh Tribe has a long term desire to acquire more land in the vicinity and create a tribal managed campground and/or RV park. Will the Park's increase in campgrounds directly compete with the Tribe?

Pg. 111

Language specific to "jurisdiction over shellfish harvest" should specify that Olympic National Park has no jurisdiction over beach access or resource harvest by members of treaty tribes. Nor does Olympic National Park have jurisdiction over setting annual harvest goals or allocations which are determined by the state of Washington and the treaty tribes as co-managers.

Pg. 114

Request for citation that states clear evidence of a decline in Bull Trout populations within specific areas of Olympic National Park; specifically in western Olympic peninsula coastal streams and rivers. The Hoh Tribe is unaware of any indication that Bull Trout populations have declined in the Hoh River and other Olympic peninsula rivers.

Pg. 179 CUMULATIVE IMPACTS, ONP Plans and Actions

The Park plan is undoubtedly written to be somewhat general in its scope and direction. According to discussions held during the government to government consultation meeting on August 16, 2006 many of the goals outlined in the plan have not been investigated or researched in great detail and have not been funded. There is also no specific timeline for many of the actions. The fore mentioned section of the plan provides some of the most specific priority actions within the park's management plan. The listing of specific projects and actions within a typically broad framework implies that these actions are priority.

No plans or actions addressed restoration or mitigation projects in the Hoh River valley. Recognizing that not all habitat loss mitigation projects could be listed in the plan, the Hoh Tribe identified three projects that should be included as priority. These projects should be prioritized separately from any road maintenance issues that may arise in the near future that would require consultation with the tribe and may warrant modification

Hoh Tribe Consultation on Olympic National Park Draft Management Plan

to mitigation priorities. The projects to be added to the *ONP Plans and Actions* section are as follows:

Fish access into "Boundary Pond" on the Upper Hoh Road. Conduct an assessment of alternatives including an alternative that links the adjacent wall-based channel to the east into Boundary Pond and provides an appropriately sized outlet from the east end of Boundary pond to an existing channel south of the road that provides access from the river to the Pond. This alternative should include a log jam component that would provide protection to the pond outlet and the road from future river meander.

Fix two fish barrier culverts on East and West Twin Creek where they cross the Upper Hoh Road within Olympic National Park. Any analysis of alternatives should utilize the Development Advisory Board (DAB) and include all feasible alternatives, including temporary road closures and single lane bridges.

Addition of LWD to the rip-rap barb located at the mouth of the Taft Pond outlet near the Hoh visitor center.

Pg. 320 Fish and Wildlife

It seems that the long term effects of relocating the Hoh access road would be substantial to fish habitat and the river ecosystem would be very beneficial, not minor as stated in paragraph 3.

Page 326 Alternative D, Ethnographic Resources

In recent memory the Park has not promoted or encouraged tribal participation in visitor information aspects of the Park's management of the Hoh U & A areas. As stated in sections above, the Hoh Tribe should have representation at the Hoh Rainforest and Kalaloch Visitor Centers. The Tribe would welcome Park overtures to receive direction from the tribe as to preparation of interpretive programs, exhibits, and literature.

Pg. 334, Kalaloch

As mentioned previously the Park should actively pursue funding to provide for at least one Hoh Tribe employee to staff the Visitor Center full time. The Center should offer Hoh Tribe members a means to consign tribal crafts and articles for visitors to purchase. The Tribe should be consulted about items that are archived by the Park Service and other museum entities for items to exhibit at the Centers.

Pg. 355, Consultation

The one consultation meeting prior to the one in August 16, 2006 that generated this comment letter, occurred in November of 2004. The only mention of tribal comments in the Draft was that there were comments that treaty rights should continue to be protected. The tribe's version of that meeting is much more detailed. One of the over arching issues that the tribe does have with the Park is that of the rights of tribal members to hunt, gather, and fish in the land of their forefathers. Some of those rights have been issues that are addressed in the above comments in the form of:

- More land acquisition or boundary changes by the Park potentially negatively affecting the tribes' effective rights.

Hoh Tribe Consultation on Olympic National Park Draft Management Plan

- Increased tourism's effects on the tribe and individual members.
- What will be the changes in transportation systems' effects on tribal members hunting, fishing, and gathering abilities?
- The lack of availability of cedar logs of suitable size has forced tribe to be unable to build traditional dugout canoes for twenty years. The traditional skills that are handed down generation to generation may be lost soon. The Park has a multitude of suitable sized trees and should make one available for the use of the tribe.
- The Tribe is being forced to acquire more land to compensate for reservation population growth, loss of land to river channel migration and tsunami danger, and economic development. The Tribe has the smallest reservation, the highest unemployment rate, and the lowest per capita income of any other tribe in the region. Therefore any competition for land in the form of demand by the Park will have a negative effect on the Tribe and needs to be consulted on a case by case basis.

Pg. 371, Appendix B, Hoh Corridor

The boundary adjustment analysis does not mention any of the negative effects on tribal members' access to the area, or effects on hunting, gathering, and fishing.

Roads are also a part of the legacy of timber harvest. The ONP would encounter many road related problems should they choose to acquire the industrial forestlands of the lower South Fork of the Hoh and Owl Mountain. This area has an extensive history of road related landslides. Engineers from the Washington State Department of Natural Resources are reluctant to decommission many of the roads in this area for fear of having to reconstruct roads to address problems that may occur in the future. They feel that continued road maintenance is the best course of action at this point in time. Would the ONP be willing to dedicate the necessary funding to properly address the environmental issues associated with newly acquired land within the Hoh Tribes U&A? Would ONP be willing to have the maintenance staff and equipment to respond immediately when corrective actions are needed? One need not look any further than the Upper Hoh Road.

The Hoh Tribe looks forward to working with the Olympic National Park in addressing these and other issues that are of mutual interest.



"Timothy M. Snowden"
<hohtribenrd@hotmail.com>

09/15/2006 01:27 PM
MST

To: olym_gmp@nps.gov
cc: Bill_Laitner@nps.gov, Nancy_Hendricks@nps.gov,
Jacilee_Wray@nps.gov
Subject: Correction

Please make the following correction to the consultation letter sent out yesterday for the Hoh Indian Tribe. On page 2, paragraph two replace "lowest per capita income" with "highest percentage of people living in poverty."

The sentence should read, "In the Socio-economic section of the Draft, the Hoh Tribe has the distinction of having the highest unemployment rate and highest poverty rate of any other reservation surrounding the Park."

Thanks,

Tim

Tim Snowden
Hoh Tribe
Natural Resources Director
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Comment 598-Makah Tribe

12/20/2006 WED 11:22 FAX 1 360 645 2323 Makah Fisheries Mngt. PEPC 203190-598 002/005



MAKAH TRIBE

P.O. BOX 115 • NEAH BAY, WA 98357 • 360-645-2201



December 20, 2006

Carla McConnell
Olympic National Park – GMP
National Park Service
Denver Service Center-Planning
P.O. Box 25287
Denver, CO 80225

Re: Comments on Draft General Management Plan / Environmental Impact Statement
for Olympic National Park in Washington State.

Dear Ms. McConnell,

Thank you for the consideration of the comments listed below at this late date.

The Makah Indian Tribe hereby provides the following comments on the Olympic National Park Draft General Management Plan/Environmental Impact Statement (GMP/EIS). The Makah Tribe's principal concern over the Draft GMP/EIS relates to the proposed expansion of the Park boundary in the Lake Ozette area. The Tribe also has concerns regarding the effects of the GMP/EIS on other Treaty protected uses of natural resources, the Ozette portion of the Makah Reservation, and cultural resources.

I. Park Boundary Expansion.

With the exception of the no action alternative, all of the alternatives evaluated in the GMP/EIS propose significant expansions of the Park boundary around Lake Ozette. The Tribe has serious concerns about the effect of these proposed boundary expansions on the Tribe's ability to exercise its Treaty hunting and gathering rights.

Under the Treaty of Neah Bay, the Tribe's right to hunt and gather may be exercised only on "open and unclaimed lands." In *United States v. Hicks*, 587 F. Supp. 1162 (W.D. Wash. 1984), the Court held that lands included within Olympic National Park are not "open and unclaimed lands" and are therefore closed to Treaty hunting. In *State v. Buchanan*, 138 Wn. 2d 186, 978 P.2d 1070 (1999), it was held that the hunting rights reserved by the Stevens Treaties are limited to each Tribe's traditional hunting areas. Because the Makah Tribe has one of the smallest traditional hunting areas of any Western Washington Tribe, any loss of access to "open and unclaimed lands" could have a serious impact on Tribal hunting and gathering.

The Ozette area is within the traditional hunting territory of the Makah Tribe and the lands affected by any of the proposed boundary expansions in the Ozette area currently provide Tribal members particularly important hunting opportunities. A four-year Tribal study that

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actively studied two elk herds utilizing radio-collared cows from each herd between 2000 and 2004 indicates that the property proposed for expansion in the Preferred Alternative is "rich" in elk abundance. The proposed Park expansion would greatly reduce hunting opportunities for Makah Tribal members in regards to the two studied herds as well as other known herds that utilize habitats within the proposed boundary expansion to the southeast and south of Lake Ozette.

The draft GMP/EIS contains inadequate discussion regarding the effect of the proposed boundary expansions on Tribal hunting or other Treaty protected uses of natural resources. In the affected environment chapter of the document, there is a brief discussion of Tribal treaty rights, which concludes with the inaccurate statement: "Nothing in this plan diminishes reserved treaty rights." (Page 133). No discussion of the effect of the boundary expansion on the Makah Tribe's treaty right to hunt and gather can be found in the environmental consequences chapter of the GMP/EIS. In the past, Tribal elk hunting has not been allowed within the Park. Indeed, Park rangers have even prohibited Tribal members from salvaging road-killed elk within Park boundaries.

As a federal agency, the Park Service has a trust responsibility to protect Treaty rights, not just ethnographic and archaeological resources. The Tribe requests government-to-government consultation on the potential effects of the proposed boundary expansions on Treaty hunting and gathering.

The GMP/EIS should carefully analyze the effect the Park boundary expansion would have on Treaty hunting and gathering opportunities and discuss measures that could reduce or mitigate these effects. Such mitigation measures should include a Memorandum of Agreement involving the Park Service, the Tribe and the Washington Department of Fish and Wildlife guaranteeing that any lands acquired under the GMP/EIS would remain open to Tribal hunting and gathering.

The Tribe has other concerns about the Park boundary expansion. In Appendix B of the GMP/EIS it is revealed that under the Preferred Alternative approximately 44,000 acres of land in the Lake Ozette watershed would be acquired outside the Park boundaries and exchanged with the State of Washington Department of Natural Resources to be managed under the "Legacy Forest" concept. (Page 372). There is no further discussion in the document concerning the Legacy Forest concept and it is unclear what goals and objective would apply to the management of Legacy Forest lands. It is also unclear whether these lands would be open to Treaty hunting and gathering. The GMP/EIS should explain the Legacy Forest concept in greater detail and analyze its effects on Treaty hunting and gathering activities and other Tribal rights and interests. Furthermore, the GMP/EIS should discuss measures that can be taken to accommodate Treaty hunting and gathering in this area should the Legacy Forest concept be implemented.

The GMP/EIS should also analyze the effect of the Park boundary expansion on road access to and from the southern portion of the Makah Reservation. Would newly acquired Park lands be managed as Wilderness, and if so, how would this affect road access to and from the Makah Reservation?

Additionally, the GMP/EIS should analyze the social and economic effects of the proposed Park boundary expansion. No discussion of the social and economic effects of the boundary expansion is found in the draft document. Over the years, the Tribe has acquired

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several thousand acres of forest lands south of the original Makah Reservation and has plans to purchase additional lands. If the Tribe is unable to acquire additional commercial forest lands, this could have a negative effect on the Reservation economy. How would the Park Service's acquisition plans affect the Tribe's ability to acquire lands for economic development?

II. Ozette Reservation.

The GMP/EIS contains little discussion of the effect of Park management on the Ozette Reservation which was transferred by Congress to the Makah Tribe in 1970. The Ozette parcel is completely surrounded by Olympic National Park and is heavily used by Park visitors. Recently, the Tribe has implemented a recreational permit program that requires visitors using Tribal lands to obtain a permit for a nominal fee. Non-members using the Tribe's lands at Ozette are subject to this requirement. However, due to the Tribe's limited resources and the Ozette parcel's geographic isolation, the Tribe has been unable to enforce this requirement with respect to the Ozette parcel, despite heavy non-member visitation.

The Tribe would like to work with the Park Service to develop a mechanism that encourages Park visitors who intend to use the Ozette parcel to obtain the proper Tribal permits in addition to Park Service permits. In addition, the Tribe would like to discuss with the Park Service the possibility that Tribal members can be hired as Park Service employees to provide interpretive services to Park visitors in the Ozette area. It is our understanding that few if any Tribal members are employed as Park rangers despite the extremely important traditional cultural properties located in this area.

III. Tribal Whaling.

The GMP/EIS states that whaling "was" an important activity for the Makah, but should also acknowledge the current importance of whaling to the Tribe. (Page 136). Additionally, the GMP/EIS should acknowledge that the Tribe's whaling rights includes the right to use the shore for the purpose of landing and harvesting whales and the right to utilize whales that become stranded on beaches within its usual and accustomed whaling area. Park beaches are clearly within the Tribe's usual and accustomed whaling grounds. The Tribe asks the Park Service to acknowledge the Tribe's whaling rights in the GMP/EIS so that issues do not arise in the future when the Tribal members seek to exercise their rights to use Park beaches for whaling purposes.

IV. Cultural Resources.

The following comments were prepared by the Makah Tribal Historic Preservation Office (THPO) and relate to the protection and preservation of cultural and archaeological resources directly related to the Makah Tribe. In 2000, the Makah Tribe entered into agreement with the National Park Service to assume the responsibilities of the State Historic Preservation Officer within the boundaries of the Makah Indian Reservation. As discussed above, the Makah hold a satellite reservation at Ozette, which is surrounded by Park lands.

The Makah people have occupied the area on the northwest tip of the Olympic Peninsula for millennia as evidenced in both the oral record and supported by archaeological evidence studied over the past decades. Therefore the comments formulated by the THPO office pertain to the continuation of customs and practices of Makah tribal members within the affected area of the draft GMP/EIS. As a general matter, it is worth emphasizing state that any action taken by

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the Park that impedes the Tribe's ability to continue cultural practices such as hunting, fishing, gathering, etc., including ceremonial practices, erodes the cultural continuity and causes an adverse effect to the Tribe. Specific issues of concern are listed below:

- Cultural landscape definitions seem to exclude prehistoric landscape features. Prehistoric features such as the Ozette prairies are being lost due to the conflict with wilderness designation and management. These prairies are important cultural resources as they provide a source of medicinal plants. Limitations on fire use prevent the long-term maintenance of these cultural landscapes. The GMP/EIS should evaluate the effects of current and proposed future management on the survival of historical prairies at Ozette and other locations with the Park.
- Where ethnographic resources are described the plan speaks to the protection and preservation of traditional cultural properties yet leaves out the discussion of the Tribe's traditional use of these properties. While natural resources need to be protected, the significance of the properties can only be preserved by traditional use, which in many cases involves harvesting. (See page 327 paragraph 3)
- The draft GMP/EIS does not mention documentation/ tracking/prosecution of violations of cultural resource laws. This is a vital part of cultural resource management.
- The Museum Collections plan in the draft GMP/EIS does not include tribal consultation for appropriate handling and or restrictions. Consultation is a valuable tool that can enhance interpretation from a tribal perspective and lends to overall respectful relationships between the Park and Tribes.
- Where Memoranda of Agreement are prescribed regarding impacts to cultural resources, appropriate Tribes should be invited signatories.

The Tribe appreciates the opportunity to comment on the GMP/EIS and requests consultation with the Park Service on the proposed expansion of the Park boundary.

Sincerely,

MAKAH TRIBAL COUNCIL



Ben Johnson, Jr.
Chairman

Comment 531-Port Gamble S'klallam Tribe



PORT GAMBLE S'KLALLAM TRIBE
31912 Little Boston Road NE • Kingston, WA 98346

PEPC 191162 -531

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September 18, 2006

Olympic National Park General Management Plan
National Park Service
Denver Service Center,
PO Box 25287
Denver, CO 80225

Thank you for the opportunity to comment on the Olympic National Park Draft General Management Plan / Environmental Impact Statement. The Port Gamble S'Klallam Tribe maintains a special interest in the Olympic National Park as it makes up most of the western extent of the tribe's Usual and Accustomed areas. The park is generally treated by the tribe as a fish and wildlife sanctuary that provides critical habitat for many of the species of fish and game that our tribal members depend on as a significant element of their livelihood.

To begin with, The Port Gamble S'Klallam Tribe shares the concerns outlined by Quileute Natural Resources Director, Mel Moon Jr. in his letter dated August 30, 2006 and addressed to Olympic National Park General Management Plan, National Park Service, Denver Service Center, PO Box 25287, Denver, CO 80225.

Furthermore, I have noted two elements that I felt were missing from the Draft General Management Plan / Environmental Impact Statement. They are as follows:

1. Any Olympic National Park Management Plan that is adopted by the National Park Service should include a plan for identifying and addressing the impacts of climate change, with particular attention given to species inhabiting areas on the edge of their temporal range. It will be important for the park management to understand the additional stresses that such species will face while they are making decisions on the location and kind of public access the park should provide.

In areas where stressed species exist, such as alpine plant communities, increased effort should be placed on educating the park goers about the potentially devastating impacts unsanctioned activities may have on those species.

2. The Olympic National Park Management has a responsibility to understand and avoid significant environmental impacts associated with maintenance and construction of roads leading to and within park boundaries.

This is of particular concern to our tribe with regard to the Dosewallips River Road washout which occurs outside of park boundaries, but is directly associated with the park

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PORT GAMBLE S'KLALLAM TRIBE

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because the road provided primary access to the park's east side. Currently the Forest Service is identifying plans to reopen the road. All of the current options for reopening the road will have significant negative impacts on fish and or wildlife habitat. It is our belief that the park should engage the National Forest Service in identifying alternatives to reopening the road. For example there may be an opportunity for the National Forest Service to provide parking on the downriver side of the washout and for the National Park Service to maintain a transit / bus (flown in) on the upriver side which could be used to ferry park goers to some of the park attractions to which current access has been reduced.

An alternative to reopening the road, such as a flown in bus, would allow the river to continue to eat away at the feeder bluff located at the washout. That particular bluff is of significant importance to the Dosewallips River system because it is a plentiful source of gravel for the river that is otherwise largely void of such sources. (gravel provides critical habitat to salmonids species). Further if the washout is allowed to continue it will likely provide large woody debris to the Dosewallips River system further enhancing the quality of the river's habitat for fishes.

Sincerely,

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Comment 311-Quileute Indian Tribe



Quileute Natural Resources
QUILEUTE INDIAN TRIBE

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PERC 190788-311

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DSC-P

Mel Moon, Jr., Director

(360) 374-3133

mel.moon@quileutenation.org

August 30, 2006

Olympic National Park General Management Plan
National Park Service
Denver Service Center,
PO Box 25287
Denver, CO 80225

Re: Draft General Management Plan for Olympic National Park
Comments by Quileute Tribe's Natural Resources Department

These comments are only those of Quileute Natural Resources, which has responsibility for protection and management of the treaty-reserved resources of the Quileute Tribe. As you are aware, the Quileute Tribe has been involved for decades in a boundary dispute with Olympic National Park, specifically, and with the National Park Service over all, and to our knowledge, those issues are not resolved, to date. Attorneys with outside counsel are working with the Quileute Tribal Council to develop appropriate remarks on that complex issue, and our remarks are not intended to cover or in any way displace such comments. They focus on natural resource department issues and how your stated dual goals of visitor access and resource management impact the tribe's natural resources.

1. Concurrent jurisdiction. Noticed parties are listed at the end of your plan (p. 354-359) but jurisdiction bears discussion at the front. The Park is not "master of its domain." In fact, it shares jurisdiction with the eight tribes listed throughout the document, throughout its entire area. Further, it has overlapping jurisdiction with Washington's DNR (Natural Resources) and DFW (Fish and Wildlife) along the coastline and with its DOE (Ecology) for water quality standards in its inland water bodies. It shares jurisdiction on the coast with Olympic Coast National Marine Sanctuary. Inland, we expect it shares jurisdiction with the USEPA on a number of issues. US Fish and Wildlife has jurisdiction over its listed birds, amphibians, and bull trout. NOAA has jurisdiction over its listed salmonids. This multiple jurisdiction deserves a full discussion in your opening sections. These governmental entities have a different role from the noticed "interested stakeholders" who may be affected by your plan, such as business owners and adjacent landowners.

You have a standard statement on page 355 of the trust relationship to the eight (8) treaty tribes listed there, and describe meetings with tribal councils and representatives. *This duty does not stop with notice and consultation. It is ongoing. It is our hope that Olympic National Park in particular and the National Park Service overall will be responsive to these comments and integrate the needed changes.*

2. Usual and Accustomed Area, Ceded Lands: These are terms for the lands and waters beyond the reservation boundaries, in which all Stevens Treaty Tribes *reserved* (never gave to the US) use and access to their fish, game, and plants. Throughout the document this off-reservation right of the tribes is inadequately and sometimes erroneously described. Only at page 133 is the discussion adequate. *Yet there are numerous references to tribes well before page 133, and no explanation of why these 8 tribes should matter, within Park boundaries.* We hope it is because the sections were drafted by different persons with varied levels of education on this matter. However, it is important for staff and the public who read this document to fully grasp just why tribes are involved. It is because the treaty tribes' rights extend into the Park, beyond their reservations, throughout the extent of their respective treaty boundaries. *The entire Park is overlain by treaty rights of the various tribes on the Olympic Peninsula.*

We refer you page 4, where the drafter briefly discusses the tribes' relation to lands in the park (and we would add "waters"). It is more than a relationship. It is shared ownership of the resources, off-reservation. It is vital the public and the staff know this. See also p. 12, first column. As you engage in all the processes discussed in Alternative D (or any other alternative selected), please recognize the duty to consult with the affected tribe(s) with U&A in your boundaries.

On page 48 the author describes affecting trust assets on the reservation. This author does not grasp the unique situation of Washington Treaty Tribes with off-reservation reserved rights. It is possible that the Park, although mostly wilderness and not managed land, may impact *trust assets* (tribally owned lands) perhaps with fire or a spill in the upper reaches of a creek, or some event that impacts adjacent ownership. However, the bigger issue is the *Usual and Accustomed Areas*. Olympic National Park lies *entirely within tribal Usual and Accustomed Area where the eight tribes have off-reservation rights to treaty resources.* The way the Park relates to the tribes and gives or does not give them access to harvest their treaty resources is the far bigger issue. Most of the treaty tribes are having access disputes with the Park and this issue needs to be corrected.

Under *US v Winans*, 198 U.S. 371, 25 S.Ct. 662, 1905, a case which is still cited favorably by the US Supreme Court and federal district courts when addressing treaty rights, the right of tribes to harvest fish on private lands as well as public ones, throughout their U&A, was affirmed. Olympic National Park's enabling statute never abrogated this right (and only Congress can abrogate treaty rights). This right continues to this day and is a huge reason why the tribes have a relationship with the Park. That needs to be addressed up front on page 48, not just potential impact on neighboring trust lands external to Park boundaries.

See p. 142 where the author states that “fishing is regulated.” Only non-treaty fishing is regulated. The treaty fishing in the rivers, lakes, and tidelands is not, or at least, not by the Park. (Treaty Tribes have their own fishing regulations and are recognized by state and federal authorities as self-regulatory.) This needs to be clarified for the public and staff and the paragraph on pa. 142 is a good place to do it.

3. The Treaty Fishing Right Includes Rivers and Lakes, Not Just Intertidal Zones.

Throughout the document, where intertidal zones are discussed, the treaty right to rivers (and lakes) is not recognized. (See, e.g., Table 1, page 57; zone discussion on pp. 72-73 where no treaty rights are mentioned under “Rivers”). Yet the treaty use of the rivers and lakes for fishing must be fully acknowledged and spelled out for staff and public eyes, as well. We are uncertain why authors only focused on the intertidal fishing. Perhaps it is because the Park and the Olympic Coast National Marine Sanctuary worked together on a committee for intertidal zoning on behalf of the latter entity. However, tribal access to rivers and lakes for treaty fishing is absolute. Further, the tribes have marine rights in the ocean parts of their Usual and Accustomed Areas, well beyond the intertidal zones. We refer the Park’s authors of this document to *US v. Washington*, 384 F. Supp. 312 (W. D. Wash. – 1974), affirmed by the Supreme Court in 1979, and left open for subproceedings to further define treaty fishing rights. Those are the primary source documents but a host of articles may also serve to explain the issue further.

4. Treaties Are the Highest Law of the Land—Article VI, US Constitution. The drafters of the document do not discuss treaties in the same section as the laws (statutes) that govern the Park. Treaties are discussed only in sections regarding Native American rights and relations with the Park. Yet treaties are right up there with the statutes, and unless they are at least mentioned in the same breath with them, even if discussed later, Park management and the public will fail to appreciate their rank and role. See, for example, pages 11, 40, 78,

On page 135, there is an error in citation of the Treaty of Olympia, which was signed in January of 1856, not in 1855. It was the predecessor document, Treaty of Quinault River, which was signed in 1855. The Treaty of Olympia was a reauthorization of the prior one to correct signatory omissions of the member tribes. There is also an omission in description of the Quileute Tribe’s jurisdiction over islands. Not only James Island, but also, all the smaller islands near it that are connected to the reservation during periods of low tide (because the land bridges are entirely exposed), are part of the Quileute reservation.

5. Environmental Justice. The Park discusses environmental justice at page 47, 48, and page 163. There should not be adverse health or environmental effects on a particular minority or low-income group because of agency policy. This concept derives from the equal protection clause of the US Constitution. We ask the Park to heed this when the tribe seeks to exercise its treaty rights within Park boundaries, throughout the Quileute U&A. Further, the Park might consider the safety issues when planning what parking lots to enlarge. We found not a word about improving the Third Beach facility, for example. Yet in the summer cars not only fill that lot but park all over the roadside of

State Highway 110, and create a traffic risk for passing cars en route to and from La Push. See, e.g., pages 328 and pages 336-347. While other parking lots within the Park might need improvement, we doubt any of them creates as much of a traffic hazard as the one at Third Beach. This is because those lots are off the main highway. The one for Third Beach is not—it is adjacent to 110. For public safety reasons of visitors to the Park and the Tribe, consider improving that lot as well. [While the lot for Second Beach is part of the Quileute-Park boundary dispute at present, should that be resolved, know that Second Beach's parking is as much a traffic hazard as that for Third Beach.]

6. Archeology, Ethnology, and Native vs. European Definitions; or, Not All Tribal Culture Fits in a Museum. Throughout the document, discussions of tribal culture are focused on artifacts and religion, without apparent acknowledgement that the fish, plants and wildlife living in the Park are every bit as much of the tribal culture as the bones, basket fragments, lithographs, and sacred places. If the Park, like many other federal and state agencies, chooses to confine itself to certain specific statutes related to archeology, it will continue to run aground with tribal relations. How, in the face of public ceremonies like Seattle's Salmon Homecoming, and those more confined to reservations such as welcoming the return of the first salmon runs, agencies fail to grasp such ideas, is puzzling. (We note that many tribal funerals and important celebrations also include elk. Selection of cedar trees for canoes is another sacred process. *The list is extensive, of how living things are integral not only to past, but also to modern-day, tribal culture.*) The Park participated in the Pilot Watershed Analysis of the Sol Duc Watershed in 1995-1996, and should recall that an appendix to that published document (by USDS FS) includes a lengthy list of plants important to the Quileute Tribe.

We recommend that you do a global search throughout the document wherever "culture", "ethnology", and "archeology" are discussed and include a discussion of how important the living resources are to the 8 tribes of the Peninsula, who use the resources for subsistence, ceremony, medicine, clothing, and in the case of fisheries—commerce. All of the above have ceremonies, song, and dance involving their use and are integral parts of the living (not dead, not artifacts) culture. Pages 28, 31, 40, 45, 80, 127, 130, 132, 213, and 249 are some of the places where this broad subject is discussed. While we can appreciate that a full discussion of the issue cannot occur in every section of the document, some cross-referencing or footnotes to show the subject is fleshed out elsewhere will be instructive.

7. Education and Outreach. Most of the discussion on these topics, with respect to visitors, does not include tribal participation. The public would probably enjoy learning about tribal use of resources from tribal elders and leaders. This would also be an opportunity for the Park to make use of supplemental staff via natural resources biologists and other experts, who may have knowledge of specific regions within the Park or just outside its boundaries. We note the subject discussed at pages 33, 67 and 148, to name just some. One time a few years back the Park invited tribal representatives to help train its staff. This is not a bad idea and could be revived. However, improved signage throughout the Park regarding tribal treaty rights would also be welcome, as would tribal participation in the Park's outreach centers. We also note that some of the Park

volunteers misunderstand their role as enforcement and have on some instances acted as if “police” with tribal members within the Park. All volunteers need to be properly trained as to the limits of their role.

7. Regarding Fish Species within the Park: On page 110 native species are mentioned. Not until page 320 are invasive exotics discussed (we omit Options A-C which are unlikely to prevail). In any discussion about what species are in the Park it is important to mention the invasive species and how they impact the native ones. The public is probably the offender and needs to be informed about this up front. The Management Plan might be the only document about the Park that is widely reviewed.

8. Management of Invasive Species. While the Park discusses the need to manage invasive species in a number of places (see, e.g., p. 75), it has not addressed that rivers are often the vectors of such species, such as knotweed, a plant group that the Park has already spent a great deal of money and effort to eradicate in the Upper Sol Duc and Lower Dickey Rivers (estuary near Rialto Beach). More attention needs to be given to river management than Plan D provides. Further, there is only brief mention of exotic fish at page 320. Warm water species are being brought in by members of the public and are out-competing the native juveniles in the streams and lakes. The Park would do well to actually name the invasive species on the same page as it names the native species of fish; and it would be illustrative to see how many invaders are now in Park waters. Finally, we find it unnecessary for the Park to introduce non-native plants for ‘cultural’ reasons as stated on page 318. That is how knotweed got started—as a decorative plant. There are many attractive native plants. The Park has made good use of them in the gardens surrounding its primary tourist center on Race Street. It should avoid use of any decorative plants that are non-native and only use native ones.

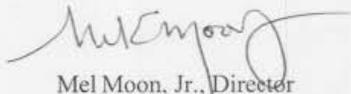
9. Park Expansion of Area/ Local Economy. Boundary expansion is discussed at pages 34, 36, 48, 81, and 245 to list just some sites. Before engaging in any expansion, or firming it up in a “Plan”, the Park should initially engage in consultation about the feasibility and impact of such expansion. Formalizing it before these steps are taken is inappropriate. For tribes, Executive Order 13175 should be implemented *well before* purchase of property in the respective tribe’s treaty area is noticed publicly. All potential impacts on the tribe should be explored, and alternatives considered. We also note that removing property from the public tax rolls has a negative impact on the rural counties involved and they are acutely aware of it. Grey’s Harbor is impacted adversely, for example, by Park purchases of homes along Lake Quinalt. Clallam County will be hurt by purchases on Lake Ozette. Hurting a county’s economy impacts all its citizens in a number of ways, such as cutting back on services. The Park should have a compelling reason for its expansion and not take it as a matter of right.

10. Hazards. The Park discusses hazardous trees on page 180 but does not discuss hazardous rocks. Along US 101 are several places where curtains have been put up to protect passing cars from falling rocks. We notice some ominous boulders on the highway as it goes through Lake Crescent. The Park should pay attention to this hazard as well as trees.

Further, at the risk of overlapping with Quileute Tribe boundary issues, we notice very little mention of tsunami risk to visitors and protection from this hazard. There is brief reference at pages 263, and 330, for example, discussing what might happen to access to Rialto Beach. The word "tsunami" is not used. It should be. There should be signage, visitor advice, and directions. The Park does this for cougars and bears. It should also do this for tsunamis.

Summary: Tribes often have the sense that agencies receive the comments and then do as they planned anyway. We remind the Department of Interior that it has a trust relationship with the treaty tribes. Our comments should be considered with the highest level of care for our welfare, in a true trustee-beneficiary relationship. They have been made with the expectation that the Park will receive them that way and we look forward to improvement in the relationship between the Park and the Quileute Tribe.

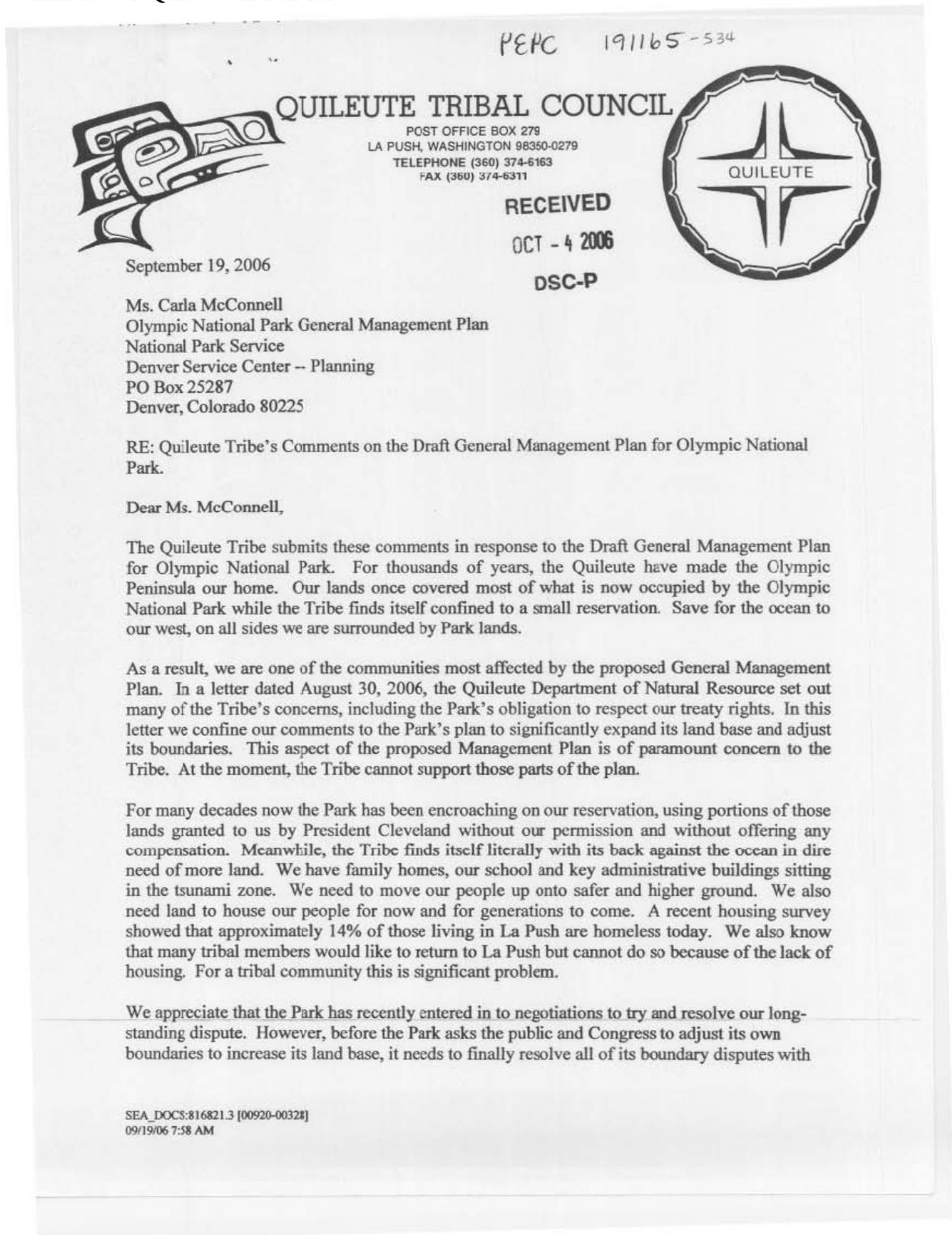
Sincerely,



Mel Moon, Jr., Director
Quileute Natural Resources
(360) 374-3133
mel.moon@quileutenation.org

cc: Richard Laitner, Superintendent, Olympic National Park
Senator Patty Murray
Senator Marie Cantwell
Congressman Norm Dicks
Governor Christine Gregoire
State Senator James Hargrove
State Rep. Lynn Kessler
State Rep. Jim Buck
Bureau of Indian Affairs, Portland
Quileute Nation Council
Quinault Indian Nation Council/NRD
Hoh Tribal Council/NRD
Makah Tribal Council/NRD
Jamestown S'Klallam Tribal Council/NRD
Lower Elwha Klallam Tribal Council/NRD
Port Gamble S'Klallam Tribal Council/NRD
Skokomish Tribal Council/NRD
Point No Point Treaty Council
Northwest Indian Fisheries Commission
Cmr. Mike Doherty, Clallam County
Mayor of Forks Nedra Reid

Comment 534-Quileute Indian Tribe



PEPC 191165-534



QUILEUTE TRIBAL COUNCIL

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DSC-P

September 19, 2006

Ms. Carla McConnell
Olympic National Park General Management Plan
National Park Service
Denver Service Center -- Planning
PO Box 25287
Denver, Colorado 80225

RE: Quileute Tribe's Comments on the Draft General Management Plan for Olympic National Park.

Dear Ms. McConnell,

The Quileute Tribe submits these comments in response to the Draft General Management Plan for Olympic National Park. For thousands of years, the Quileute have made the Olympic Peninsula our home. Our lands once covered most of what is now occupied by the Olympic National Park while the Tribe finds itself confined to a small reservation. Save for the ocean to our west, on all sides we are surrounded by Park lands.

As a result, we are one of the communities most affected by the proposed General Management Plan. In a letter dated August 30, 2006, the Quileute Department of Natural Resource set out many of the Tribe's concerns, including the Park's obligation to respect our treaty rights. In this letter we confine our comments to the Park's plan to significantly expand its land base and adjust its boundaries. This aspect of the proposed Management Plan is of paramount concern to the Tribe. At the moment, the Tribe cannot support those parts of the plan.

For many decades now the Park has been encroaching on our reservation, using portions of those lands granted to us by President Cleveland without our permission and without offering any compensation. Meanwhile, the Tribe finds itself literally with its back against the ocean in dire need of more land. We have family homes, our school and key administrative buildings sitting in the tsunami zone. We need to move our people up onto safer and higher ground. We also need land to house our people for now and for generations to come. A recent housing survey showed that approximately 14% of those living in La Push are homeless today. We also know that many tribal members would like to return to La Push but cannot do so because of the lack of housing. For a tribal community this is significant problem.

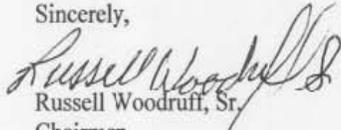
We appreciate that the Park has recently entered in to negotiations to try and resolve our long-standing dispute. However, before the Park asks the public and Congress to adjust its own boundaries to increase its land base, it needs to finally resolve all of its boundary disputes with

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09/19/06 7:58 AM

~~EXPANSION TO SOUTH~~

The Quileute Tribe will remain an active opponent of the Park's expansion efforts until the Park reaches a fair settlement with the Tribe. We look forward to working with the Park to make that happen soon.

Sincerely,



Russell Woodruff, Sr.
Chairman
Quileute Tribal Council

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Comment 356-Quinault Indian Nation

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Quinault Indian Nation

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September 25, 2006

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9-25-2006

Olympic National Park General Management Plan
National Park Service
Denver Service Center
P.O. Box 25287
Denver, Colorado 80225

RE: Quinault Indian Nation comments on Draft Olympic National Park General Management Plan

The Quinault Indian Nation ("Nation") has reviewed the Draft Olympic National Park General Management Plan ("Plan") and submits the following comments for your consideration.

We first take this opportunity to remind the Park of the Nation's keen interest in protecting and preserving the fish, wildlife, habitat, and plant resources within the Park boundaries.

The Nation is signatory to the 1855 Treaty with the Qui-nai-elt, signed on the Qui-nai-elt River July 1, 1855, ratified by Congress March 8, 1859, and signed by President Buchanan April 11, 1859. In its Treaty, the Nation reserved the right to fish, hunt, gather, and harvest shellfish. In exchange for these and other rights, the Quinault people ceded vast lands on the Olympic Peninsula, including the land now known as the Olympic National Park. Treaties are the highest law of the land. The Boldt decision affirmed the Nation's treaty fishing rights, and in doing so, established co-management obligations by the Nation and the State of Washington over fisheries resources. *United States v. State of Washington*, 384 F. Supp. 312 (W.D. Wa. 1974). The Park lies within the Nation's usual and accustomed fishing areas, as identified in the Boldt decision. Activities in the Park directly impact the Nation's treaty areas within the Park and downstream on its Reservation. As such, the Nation relies on Park actions as defined in the Management Plan to protect the habitat critical to its federally-guaranteed treaty fishing rights. Additionally, the Park has a trust responsibility to the Nation, and accordingly, has a fiduciary obligation to protect the Nation's interests, its Reservation land, and its treaty fishing rights. The Plan should more specifically explain the nature of the Nation's treaty rights and the special trust relationship between the Park and the Nation. Additionally, the proximity of the Quinault Indian Reservation to the Park and the Nation's strong cultural and spiritual ties to the Park should be more thoroughly infused throughout the Plan.

We also provide the following specific comments:

Page 19: *There is enough flexibility in the following to allow poor practices:*

1

“Natural floodplain values are preserved or restored. Long-term and short-term environmental effects associated with the occupancy and modification of floodplains are avoided when practicable. When it is not practicable to locate or relocate development or inappropriate human activities to a site outside the floodplain, the National Park Service

- prepares and approves a statement of findings in accordance with Director’s Order #77-2
- uses nonstructural measures as much as practicable to reduce hazards to human life and property while minimizing impacts on the natural resources of floodplains
- ensures that structures and facilities are designed to be consistent with the intent of the standards and criteria of the National Flood Insurance Program (44 CFR 60)”

This section should be written to ensure environmental protection within floodplains.

Page 23: States, “Promote harvest and management practices that protect wild salmonids. Work with area fisheries managers to implement escapement levels necessary to achieve the full role of anadromous fish in the ecosystem.” *The Nation disagrees that the ONP has any role to implement escapement goals. This second sentence should be deleted.*

Page 23: States as a strategy to protect native species, “Promote harvest and management practices that protect wild salmonids. Work with area fisheries managers to implement escapement levels necessary to achieve the full role of anadromous fish in the ecosystem.” *This section should more specifically state: In cooperation with tribal governments, preserve and promote sustainable, harvestable levels of fish populations.*

Page 24: States, “• Control or eliminate exotic plants and animals, exotic diseases, and pest species where there is a reasonable expectation of success and sustainability. Base control efforts on

- the potential threat to legally protected or uncommon native species and habitats
- the potential threat to visitor health or safety
- the potential threat to scenic and aesthetic quality
- the potential threat to common native species and habitat”

The Nation strongly supports these measures.

Page 27: States, “Park operations and wilderness functions are coordinated in the park to manage and protect natural and cultural resources in wilderness and preserve wilderness character. Management is coordinated with the U.S. Forest Service to provide consistency in regulations, standards, and guidelines to the extent feasible, and work will continue to be done with other local and regional groups, communities, and agencies to preserve wilderness values.” *This section does not mention coordination with Tribes but should.*

Page 28: States, "Monitor shell middens and petroglyph sites in the at-risk coastal areas on monthly, annual, or biannual basis." *This statement is vague and defaults to biannual monitoring in light of perennial budget shortfalls. The Nation requests monitoring on at least an annual basis.*

Page 28: States, "Treat all archeological resources as eligible for listing on the National Register of Historic Places pending a formal determination by the National Park Service, the state historic preservation office, and associated Indian tribes as to their significance." *This approach does not address sensitivity of potential sites to the Nation, nor does it acknowledge or address the probability of looting (or other desecration) of these sites. In order to protect the integrity of such sites, and given the history of looting publicly known historical sites, the Park should defer to the Nation's wishes whether to include such sites on a public register.*

The treatment of cultural resources would be improved by better addressing inadvertent discoveries and NAGPRA items. An example of a project with the potential for inadvertent discovery is a proposal to relocate Highway 101 this would involve rerouting and excavation of the road system. Cultural items may be uncovered during these activities, and these types of discoveries should be more thoroughly covered in the document. Also, on NAGPRA issues, is the ONP assessing the current inventory for repatriation? The ONP also proposes to house all new findings in an ONP facility. The Nation and other interested Indian tribes should be considered for housing cultural items pertaining to their people.

Page 28: Strategies to protect archeological resources include gathering field data regarding rock shelters, lithic scatters, and hunting camps; surveying and inventorying sites parkwide; and monitoring shell middens and petroglyph sites. *Consultation with tribes is only indicated if disturbance or deterioration are unavoidable. The Nation requests coordination regarding these activities,*

Page 36: States, "The south park boundary upstream of Lake Quinault would be adjusted to include the full meander width of the Quinault River for protection of elk habitat." *While this might benefit fish, it may negatively affect the Nation's elk hunting. The Plan must address these potential impacts.*

M40: States that Preferred Alternative D includes: "The unpaved [Queets River R]oad would be retained and moved as needed in response to river meandering, using methods that minimize adverse effects on river processes and aquatic and riparian habitats, to the extent possible." *The Plan should include government-to-government consultation with the Nation prior to moving the road in the event the Park determines the road needs to be moved.*

M44: States that Preferred Alternative D includes: "Relocations of the roads [North Fork, Graves Creek, Finley Creek] might be necessary due to river movement." "Year-round road access would be retained using methods that minimize adverse effects on river processes and aquatic and riparian habitats to the extent possible." *The Plan should*

include government-to-government consultation with the Nation prior to moving road in the event NPS determines road needs to be moved.

Page 41: The purpose of the General Management Plan (GMP) is to provide a framework for decision making by National Park Service (NPS) staff regarding issues and resources in and around the Olympic National Park (ONP). An important element the NPS must bring into any decision making process is how the decision will affect the rights and interests of the Indian tribes that surround the ONP. Therefore, this section is incomplete. Part of the decision making framework must include recognition of the NPS trust responsibilities and the rights and interests of the Nation and other Indian tribes. The section should be revised to include the following question: What are the ways and to what extent can the Park work with the Tribes to protect their established rights and interests regarding issues and resources affected by ONP?

Page 55: States, "There is currently no management zoning in Olympic National Park that meets current NPS management zoning standards. However, for purposes of the comparison, zoning reflective of the current conditions was included in the no action alternative." The no-action alternative should include those steps the ONP would be expected to take to bring it into compliance with the NPS management zoning standards.

Page 64: The Plan is vague regarding how costs were considered in the "choosing by advantages" approach to evaluating the alternatives. An objective measure of the likelihood of funding should have been a factor used in the evaluations.

Page 76: States, "• Designate river and stream access/crossing points, and use barriers and closures to prevent trampling and loss of riparian vegetation." This might affect fishing access for Quinault fishers, which should be addressed so as not to impair treaty-protected fishing rights.

Page 76: States, "Implement a noxious weed control program." The Nation applauds this activity and requests the Park coordinate with the Nation on eradication of noxious weeds to maximize the efficiency and effectiveness of controlling noxious weeds upstream and downstream of the Reservation boundaries.

Page 77: The section on Management of Fish and Wildlife does not, but should, include consultation with affected tribal governments regarding projects within essential fish habitat.

Page 81: States, "A vegetation management plan would be developed. Topics could include the management and monitoring of rare plants and the control and eradication of exotic vegetation." This sentence should read, "Topics would include... eradication of exotic vegetation." There is no reason to create a vegetation management plan that does not eradicate detrimental exotic vegetation.

Page 81: States, "A North Shore Road/Finley Creek development concept plan would be developed to address the hydrologic and geomorphic issues associated with maintaining year-round vehicle access in this unstable environment and to return Finley Creek to a more naturally functioning and stable condition." The Nation agrees this should occur.

Page 84, Table 3: *The preferred alternative does meet NEPA Section 101(b) goal A in the Quinault watershed. In fact, the preferred alternative will result in continuation of the current trends of deteriorating hydrologic processes and loss of associated fish and wildlife habitats.*

Note: The delineation of alternatives into extreme choices is an unfortunate approach that does not allow for balancing the purposes of the Park and the interests of its users and neighbors. The only way to achieve NEPA goal A in the Quinault drainage is to implement the River Zone. However, the River Zone is only included in the extreme Alternative B that does not allow sufficient public use and support. The preferred alternative should allow for application of the River Zone in drainages that are in particular need of restoration and/or protection; especially where, as in the case of the Quinault River, actions and facilities of the ONP are contributing to the degradation of hydrologic processes.

The preferred alternative does not meet NEPA Section 101(b) goal B. The current condition of the Upper Quinault River floodplain is not aesthetically or culturally pleasing, and under the preferred alternative it will continue to deteriorate.

The preferred alternative does not meet NEPA Section 101(b) goal C. Continuing the current alignments and uses of the ONP road system in the Quinault drainage does not provide beneficial uses without environmental degradation.

The preferred alternative does not meet NEPA Section 101 (b) goal D in the Quinault Watershed. Under Alternative D, the hydrologic processes in the Upper Quinault River will continue to deteriorate.

The preferred alternative does not meet NEPA Section 101(b) goal E in the Quinault Watershed. A balance between population and resource use is not currently in place and nothing in the suggested actions for the Quinault will achieve that balance. Under Alternative D, the hydrologic processes in the Upper Quinault River will continue to deteriorate.

Page 103: Table 5 lists the Quinault River as "non-glacial" which is incorrect. The east fork is glacial and the north fork is non-glacial.

*Page 109: Lists Olympic mudminnow (*Novumbra hubbsi*) as only occurring within the ONP and this is incorrect. They are quite common outside of the Park. We believe the Olympic torrent salamander is also present outside of the ONP, though it is listed as only being present within the ONP. Additionally, the Plan also lists the jumping slug as exclusive to the ONP and this is incorrect as well based on information received from National Forest staff.*

Page 109: States, "The migratory herds that reside on the north, east, and south sides of the park, and some resident herds on the western boundary, often cross out of park boundaries where they are hunted. Because they have no hunting pressure or fear of

Page 110: States, "Introduced hatchery stock, overfishing, and degraded habitat have resulted in the destruction of wild, native strains of fish and altered aquatic systems." *This is a generic statement that is not truly applicable to all ONP stocks of salmonid fishes and should be restated to identify where this has occurred and also identify that the remaining stocks have little or no hatchery influence. This information is available should be used rather than a generic statement that is more applicable to the State of Washington than to the ONP.*

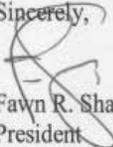
Page 111: States, "Olympic National Park has jurisdiction over shellfish harvest within the park's intertidal area, including Kalaloch Beach. Shellfish harvest is allowed only in accordance with seasons and limits set by Olympic National Park in cooperation with the Washington Department of Fish and Wildlife which has jurisdiction over the other non-reservation coastal areas of Washington." *The Nation asserts that the ONP is not a co-manager of the fisheries resource, and accordingly, does not have such jurisdiction. In addition, the statement does not even acknowledge the treaty-reserved right to fish (including shellfish).*

Page 111: States that mountain goats are non-native. *Based on the Nation's review of the ONP management plan EIS, we believe the Plan discredits the goat sightings and artifact items provided by the Nation, but used these same sources to claim that wolves were native.*

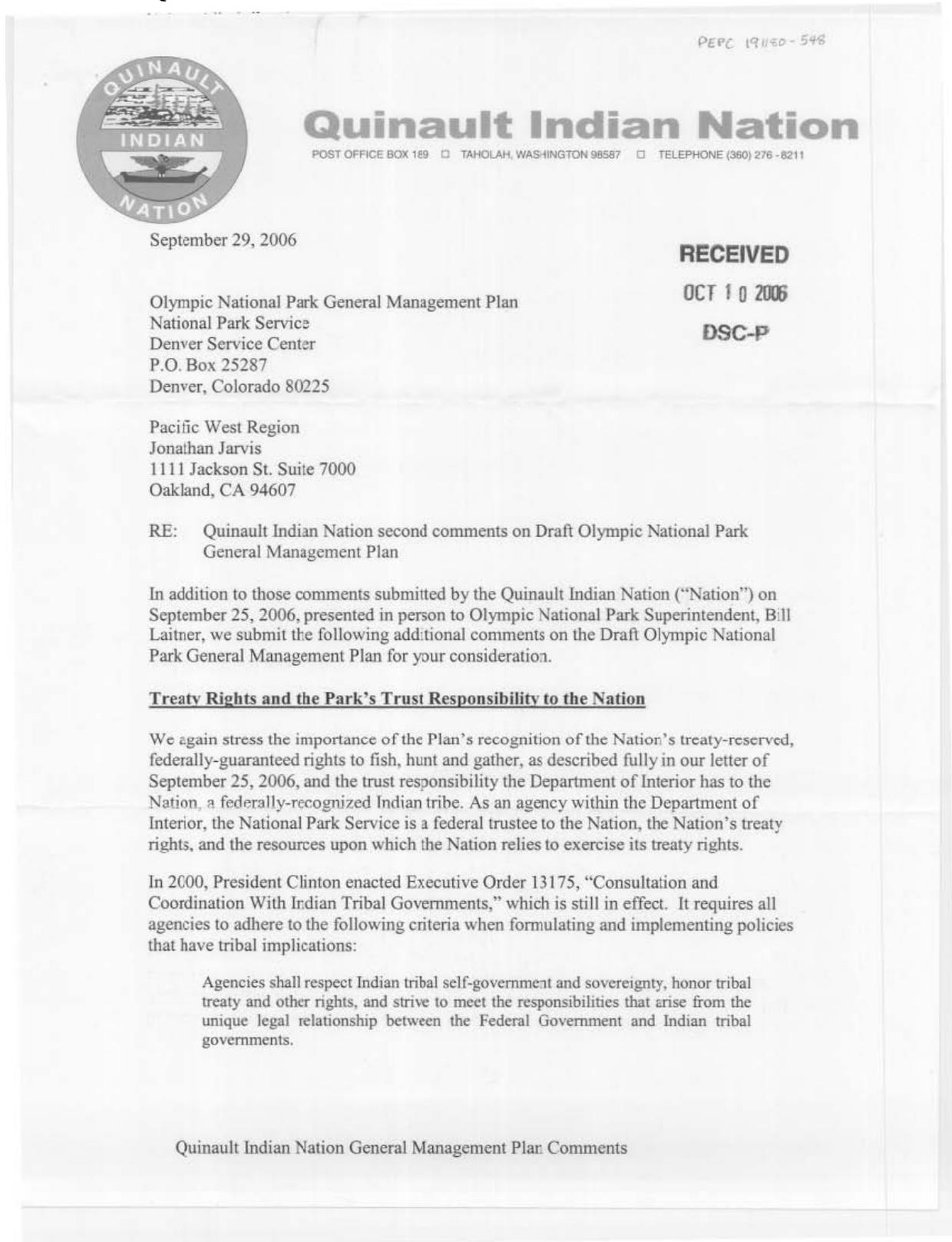
Page 315: In the conclusion of the analysis of hydrologic impacts of Alternative D, the report states, "This alternative **would** improve floodplains in the Hoh and Quinault areas" *The justification for this statement is not clear. In fact, the Plan makes no commitment to altering the current status regarding road placement, maintenance, or protection in the Quinault floodplain. In addition, the Plan does not mention the Park Service bridge across the Quinault River, a structure that causes major impairment to hydrologic processes on the floodplain. (The report does say that, "Relocation of the roads in the Quinault floodplain and watershed, including North Fork and Graves Creek roads, and the North Shore Road at Finley Creek, **could** occur under this alternative." This is hardly a commitment to restoring hydrologic integrity of the Quinault floodplain.)*

Thank you for your consideration of these comments. We will submit further comments prior to the end of the comment period. We look forward to working with the Park toward implementing the Plan and improving our working relationship in the process.

Sincerely,


Fawn R. Sharp
President

Comment 548-Quinault Indian Nation



b. With respect to Federal statutes and regulations administered by Indian tribal governments, the Federal Government shall grant Indian tribal governments the maximum administrative discretion possible.

c. When undertaking to formulate and implement policies that have tribal implications, agencies shall:

1. encourage Indian tribes to develop their own policies to achieve program objectives;
2. where possible, defer to Indian tribes to establish standards; and
3. in determining whether to establish Federal standards, consult with tribal officials as to the need for Federal standards and any alternatives that would limit the scope of Federal standards or otherwise preserve the prerogatives and authority of Indian tribes.

(See Attached, Section 3.)

Similarly, the Secretary of the Interior issued Secretarial Order #3206 on June 5, 1997, regarding "American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act," also still in effect. It states that, "This Order shall be implemented by all agencies, bureaus, and offices of the Departments, as applicable." (See Attached, Section 10). Among other provisions, the Order requires the Park to "work directly with Indian Tribes on a government-to-government basis to promote healthy ecosystems."

The Nation's adjudicated usual and accustomed treaty fishing and shellfishing areas include the Olympic National Park. Therefore, the General Management Plan and subsequent plans, including implementation of this General Management Plan, must protect, and not conflict with, the Nation's treaty rights.

We pointed out in our letter dated September 25, 2006, and during a government-to-government consultation meeting with Superintendent Bill Laitner, that statements in the General Management Plan, on their face, conflict with the Park's fiduciary obligation to the Nation as a trustee. Specifically, explicit and implicit assertions that the Park has co-management responsibilities over fish and shellfish harvest are unacceptable and must be stricken from the Plan. The Nation and the State of Washington, through its Department of Fish and Wildlife ("WDFW"), share these obligations. The Park has no legal role over harvest management. The Nation understands the Park is currently negotiating a second agreement with the WDFW regarding Intertidal Harvest Management of razor clams and other intertidal species within the Park. As a trustee to the Nation, with a fiduciary responsibility to protect the Nation's treaty rights to these resources, **the Park must cease these negotiations immediately and have further government-to-government consultation with the Nation on this specific issue.** The Park's assertion of co-management responsibilities in the Plan harms the Nation's treaty-protected interests and it must engage in further consultation on this issue. The Park cannot fulfill its role as trustee while in the role of co-manager as there is an inherent conflict of interest between

the two roles. To support this position, we attach correspondence from the WDFW to the Park explaining the respective roles of the two agencies.

Mr. Laitner requested specific comments on pages 133-136 relating to Olympic Peninsula Tribes. We recommend adding language that specifically acknowledges that Tribes' treaty shellfishing rights. We also recommend the Plan explain the nature of the Park's trust responsibility to the affected Tribes. **The Park has a heightened duty and fiduciary obligation to not only acknowledge these treaty rights, but to take clear, meaningful steps to protect them throughout the Plan.** The Nation's interests must be elevated above those of the general public and the Plan should explicitly state this. Therefore, the statements by Park representatives that they must balance the need for access by the public with the goal of resource protection are misguided. The balance must weigh in favor of resource protection when treaty rights are implicated.

As we pointed out in our meeting, although the Plan explicitly recognizes and discusses treaty rights between pages 133 and 136, the Plan falls short of adequately protecting the Nation's treaty interests. Acknowledgement of the Nation's treaty rights is not a three-page endeavor. Rather, the Nation's treaty rights, and the Park's trust responsibility to protect them, are fundamental facts that must become philosophically foremost in the Park's activities.

Additionally, on page 48, the Plan states the National Park Service does not manage Indian assets and that the overriding mandate is to manage the park consistent with park laws and regulations. This statement disregards the Park's responsibility to protect Indian assets within the Park—the fish, shellfish, wildlife, and other natural resources upon which the Nation relies to exercise its treaty rights.

Preferred Alternatives

By choosing Preferred Alternative D, the Plan document asserts that a balance of the Park's objectives to allow for public access and protect natural resources has been achieved. Nowhere in the alternatives evaluations does the document state how the Park considered tribal interests in seeking this balance. This omission has caused the Park to choose an alternative approach that is harmful to the interests of the Nation and its treaty-protected resources. For example, selection of Alternative D will perpetuate practices in the Quinault River floodplain that have contributed to disrupted and degraded physical natural habitat forming processes that are causing significant loss of the Nation's salmon resources. Adoption of Alternative D in the General Management Plan will restrict the Park to activities that will not fully protect the natural resources of the Park. We believe the Plan must allow maximum flexibility for the Park to act in its role as Trustee in protecting resources of particular interest to the Nation.

By selecting alternative D, the Park retains the option to maintain and protect infrastructure and access over fish and wildlife habitat. The selection of Preferred Alternative D is therefore inappropriate as it fails to maintain, protect, and restore the most basic natural processes that support healthy forested river valley ecosystems and

critical habitat for fish and wildlife. In addition, Alternative D conflicts with many of the Park's own desirable conditions that were identified in the draft general management plan.

As an acceptable alternative, the Nation will require consultation with the Park to develop as partners, "specific" management plans for the Quinault and Queets River watersheds in lieu of both the General Management Plan and if deemed necessary, subsequent plans such as the Wilderness Management Plan.

Harvest Management

One area the Nation disagrees with the Plan is with regard to the no-harvest restrictions. This approach is justifiable for conservation needs, but may not be the best approach overall. First, the Nation takes issue with the lack of scientific basis for the no-harvest decision. Both the State and Nation, as co-managers, dispute the Park's rationale for such a stringent limitation.

The Nation manages fish and wildlife for harvest of these traditionally harvested species and expect to continue to do so. A basic requirement of any successful species is the presence of surplus reproductive capacity. All successful species must be able to reproduce at levels in excess of replacement (i.e., greater than one progeny per reproducing adult) in order to recover the population following natural reductions in the population (e.g. disease outbreaks). The presence of surplus reproductive capacity provides opportunity for harvest in most years. This same surplus is essential for the support of other fish-eating species such as eagles and bears. Sustainable long term human harvest of salmonid fishes is documented by several thousand years of utilization by the Tribes combined with the documented abundance of these species when settlement by non-Indian people began over 150 years ago. The tendency of the Park to stop all human harvest within the Park is counter to this biological reality. It is inappropriate to address population reductions that are not due to human harvest through restrictions on human harvest. As an example, stopping all human harvest in the Puyallup River Basin will not correct the huge damage done to the river's productive capacity by dikes and other actions to protect human intrusions into the floodplain.

This is probably best illustrated with ungulates (elk and deer) in that the creation of "no harvest" zones alters their behavior. When elk discover an area where they are not subject to predation, they spend too much time in those areas degrading the habitat through overgrazing. The Nation has a tagged herd of elk that spends over 90% of its time in the Park, emerging only in the late winter and early spring when the forage is gone in the Park and they are nearly starving. These elk are gaunt and display reduced reproduction compared to those animals living most of the time outside of the Park. These animals respond to both tribal and non-tribal hunting seasons by migrating into the Park. This over utilization of a small part of their habitat is detrimental to the elk, their habitat, and the ecosystem.

By eliminating non-tribal harvest of various species, the Plan unnecessarily creates the perception by non-Indians that Indian harvest is improper or unfair. The Nation does not want to be put into a position appearing to have “special rights,” which often generates more hatred and prejudice. Also, it would be helpful to create an opportunity to educate the public on the Treaty-reserved harvest as well as tribal culture. We encourage the Park to consider limited access for non-tribal harvest. We agree that unlimited access may be an inappropriate approach, but alternatively the Park should consider some form of limited access/limited harvest. The Park could provide a certain number of permits per year for non-Indian harvest activities. These access permits would be available at the ranger stations, and this would allow an opportunity for education on why the permits are required and an explanation of the Tribal culture and harvest management. The permitting process could also be used to provide education on the life history of targeted species and how these coastal resources are managed. These permits could be issued on a first come – first served basis or through an annual application approach with random allocation.

Roads Management

The Park has acknowledged that roads can be detrimental to ecological processes, but does not plan any measures to reduce or eliminate those detrimental effects. The road systems within floodplains are the most damaging through their effects on riverine processes, but roads on unstable landforms can be very damaging as well. To a certain extent, some type of road system is necessary to access the Park, but given the known ecological risk of roads, the GMP must include actions to move the road systems outside of the floodplains. The Plan should describe the use of a cooperative strategy with the State, Counties, and Tribes to accomplish this task while protecting the treaty right interests of the Nation.

Public Education

The Nation is very interested to work with the Park to display our tribal culture in the Park so Park visitors can learn about the cultural and spiritual significance of the incredible lands we traditionally lived on and used within the Park’s boundaries. We recommend creating a longhouse to be used explain traditional ceremonies and customs. We offer to work with the Park to this end and to bring tribal members to the Park to assist with interactive education.

Additionally, we recommend the Park begin the education process now by putting up informational signs around the lodge describing the unstable slopes and the ocean erosion would lay the ground work for the relocation. In addition, this educational system needs to provide information on the detrimental effects any actions to retain the existing sites would cause. It needs to be explained that hard surfaces along the ocean will degrade the sand beach to the detriment of the razor clams and other sea life dependant on the current sand beach.

Collaboration Between the Nation and Park

The Nation is interested to form a long-term working relationship to address our ongoing concerns over the Plan, its implementation, and other issues affecting the Nation as a neighbor to the Park. We want to establish a meaningful consultation process that will result in meeting both the Park's goals and the Nation's goals. From the Nation's perspective, consultation means respectful, effective communication in a cooperative process that works toward a consensus, before a decision is made or an action is taken. Consultation can be contrasted with two other forms of communication: notification and obtaining consent. Notification focuses on providing information, so potentially affected parties have the chance to respond to a pending action. In our experience, the Nation is often notified after basic decisions have already been made and there is generally no formal follow-up. The Navajo Nation made the distinction very clear in a 1993 memorandum: "The majority of agencies with which we are familiar do not distinguish between 'notification' and 'consultation,' and consider the former as adequate to meet their mandates for the latter. This neither meets the letter or spirit of the consultation requirements of the laws mandating consultation." We agree and hope this explanation is useful in structuring our future consultation discussions.

To that end, we propose setting up a process for regular, ongoing government-to-government consultation that includes bi-monthly meetings that include technical staff and appropriate policy representatives from each government. The Nation proposes to work together with the Park to prioritize issues to discuss and actions to pursue using the following framework for our government-to-government consultation discussions:

1. The Park and Nation meet on the basis of political equality to discuss, negotiate, and mutually agree on:
 - A. Principles and procedures for dealing with one another,
 - B. An agenda of issues and concerns which each party believes requires intergovernmental cooperation and action,
 - C. The idea that both parties accept the basic notion of mutual respect, cooperation and compromise, sovereign equality and reciprocity.
2. The definition of government-to-government relations requires that each party accept the sovereignty of the other, unconditionally.
3. Internal interference is strictly prohibited by either party.
4. Good faith may serve as the foundation for agreement, but a third party observer or arbitrator may be necessary to ensure agreement compliance.

5. Government-to-government relations between Indian Governments and the U.S. government or agencies thereof are, by definition, bilateral unless multi-lateral relations or negotiations are first formalized.

Finally, the Nation requests additional government-to-government consultation regarding the next iteration of the General Management Plan. Specifically, we request to review and provide comments on, and discuss through government-to-government consultation, the final draft Plan **prior to** its becoming formally Final.

The Nation looks forward to establishing a clear path of communication with the Park and regular government-to-government consultations on these and other Park issues of concern to the Nation rather than invoking other legal remedies. As a starting point, we believe it is imperative that the concerns we have raised are addressed through additional discussions and action by the Park. Of utmost importance is addressing the Park's assertion of harvest management responsibilities. We look forward to the Park's written response to our comments and concerns and further discussions on this matter.

Sincerely,



Fawn R. Sharp
President

cc: Richard Laitner, ONP Superintendent
Senator Patty Murray
Senator Maria Cantwell
Congressman Norm Dicks
Governor Christine Gregoire
State Senator James Hargrove
State Rep. Lynn Kessler
State Rep. Jim Buck
Bureau of Indian Affairs, Portland
Quileute Nation Council
Quinault Indian Nation Council/QDNR
Hoh Tribal Council/NRD
Makah Tribal Council/NRD
Jamestown S'Klallam Tribal Council/NRD
Lower Elwah Klallam Tribal Council/NRD
Port Gamble S'Klallam Tribal Council/NRD
Skokomish Tribal Council/NRD
Point No Point Treaty Council
Northwest Indian Fisheries Commission
Cmr. Mike Doherty, Clallam County
Mayor of Forks, Nedra Reid

Quinault Indian Nation General Management Plan Comments

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State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way N • Olympia, WA 98501-1091 • (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building • 1111 Washington Street SE • Olympia, WA

August 7, 2002

Mr. David K. Morris, Superintendent
Olympic National Park
600 East Park Avenue
Port Angeles, Washington 98362-6757

Dear Mr. Morris:

Thank you for your April 8, 2002, letter concerning the working relationship between the Olympic National Park (ONP) and the Washington Department of Fish and Wildlife (WDFW), and our efforts to strengthen and clarify our respective roles and responsibilities. I, too, appreciated the opportunity to meet with ONP staff and discuss the issues related to science, harvest management, and enforcement of fisheries resources within the ONP.

We have received the ONP's June 5, 2002, draft proposal for a General Agreement between the ONP and WDFW. We have spent considerable time reviewing the draft, both internally and with the Attorney General's Office. Our review focused on its intent, its legal ramifications, and its effect on our ability to carry out what we believe are WDFW's statutory obligations. Before I address the rationale regarding the modifications we are proposing to make, I would like to describe why we believe we have a definitive role in managing shellfish within the ONP.

In 1986, Congress extended the Park boundaries to include the tidelands (and islands) along the Pacific Ocean between the Makah and Quinault Indian reservations, except for tidelands directly in front of the Hoh, Ozette, and Quileute Indian reservations. Section 251n of the 1986 law included the following language that we believe preserved state jurisdiction on the tidelands, in contrast to the general presumption of state laws contained in the Olympic National Park Organic Act:

Provided, That such lands as are identified in this paragraph shall continue to be open to fishing and to the taking of shellfish in conformity with the laws and regulations of the State of Washington.

In 1988, when the state deeded the tideland strip to the United States, it included this same language as a covenant in the deed. Our interpretation of the 1986 language is based in part upon our research regarding the meaning of the "in conformity with the laws and regulations" language as well as that language's use in other statutes involving the National Park Service and the

Mr. David K. Morris
 August 7, 2002
 Page 2

Department of Interior. Our interpretation is also supported by the legislative history of the 1986 amendment. When the 1986 amendment was presented to the House for approval, Representative Vento explained, in a floor statement, that the language was added to ensure that "the authority of the State of Washington shall continue to be what would be in the absence of legislation."

As a result of our research on this issue, we believe that since state laws and regulations apply to the taking of shellfish on tidelands included in the deed, we have a responsibility to acquire the necessary biological information for resources that have an anticipated harvest before promulgating such regulations. Adequate monitoring, sampling, and enforcement of the catch would also be necessary to properly manage the resource.

As a result of our conclusion that the state has a responsibility to manage the shellfish resources in the tidal areas included in the deed, we also must comply with our statutory responsibilities under state law which include:

- RCW 77.04.012: Wildlife, fish, and shellfish are the property of the state. The commission, director, and the department shall preserve, protect, perpetuate, and manage the wildlife and food fish, game fish, and shellfish in state waters and offshore waters.
- RCW 77.04.120: The director shall investigate the habits, supply, and economic use of foodfish and shellfish in state and offshore waters.

Finally, as a result of our determination that we have a management responsibility on the deeded tidelands, we believe that we have legal obligations to comply with the Shellfish Implementation Plan adopted by the Court in the *U.S. v. Washington*, Sub-proceeding No. 89-3, and the related stipulation between the state of Washington and the Quinault Indian Nation, by developing management plans for shellfish resources as needed with the affected coastal treaty Indian tribes.

WDFW certainly understands, appreciates, and respects the federal authorities and jurisdictions of the National Park Service as it pertains to the lands within the Olympic National Park. We share many common goals relative to providing public enjoyment of the intertidal zone of the Pacific Coastal area. We understand that the ONP has independent goals relative to maintaining the aquatic and terrestrial ecosystems and that any harvest opportunities must be carefully weighed against these other, and sometimes, independent goals and policies of the Park.

We desire to construct a working agreement that focuses more on how we intend to work together to meet our respective responsibilities and less on describing each of our authorities. The draft we have proposed deals strictly with the management of razor clams on Kalaloch

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Beach. It is limited in duration so that we have an opportunity to build upon our successes and provide opportunities to revise or add areas of agreement in the future. It is founded on the belief that in order to be successful in managing the resource, including working with the tribes, a joint approach needs to be adopted by both WDFW and the ONP.

Regarding the so-called "Required Clauses" that were included within the ONP's previous draft, we have deleted those provisions. I suggest that we have our respective legal representatives work out those details. Assistant Attorney General Matt Love can be reached at (360) 753-6204. We may need another meeting to discuss these issues and do some additional drafting. If you have additions or modifications to the language we have proposed, we would be happy to consider them. Please have your staff contact Michele Robinson at (360) 586-6129, ext. 211, with any proposed changes.

As for this management cycle, I suggest that the stock assessment work, the negotiations with the tribes, and the season setting and associated work, including monitoring and enforcement, be accomplished using joint teams of ONP and WDFW representatives.

I also appreciate the good working relationship we have had over time. I think we have an opportunity to greatly enhance our relationship and our successes, and that is the spirit in which we make our proposal to you.

Sincerely,



Philip Anderson, Special Assistant
Intergovernmental Resource Management

PA:dak

Enclosure

cc: Matt Love, AAG
Michele Robinson, WDFW
Dan Ayres, WDFW

SECRETARIAL ORDER #3206

Subject: American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act

Sec. 1. Purpose and Authority. This Order is issued by the Secretary of the Interior and the Secretary of Commerce (Secretaries) pursuant to the Endangered Species Act of 1973, 16 U.S.C. 1531, as amended (the Act), the federal-tribal trust relationship, and other federal law. Specifically, this Order clarifies the responsibilities of the component agencies, bureaus and offices of the Department of the Interior and the Department of Commerce (Departments), when actions taken under authority of the Act and associated implementing regulations affect, or may affect, Indian lands, tribal trust resources, or the exercise of American Indian tribal rights, as defined in this Order. This Order further acknowledges the trust responsibility and treaty obligations of the United States toward Indian tribes and tribal members and its government-to-government relationship in dealing with tribes. Accordingly, the Departments will carry out their responsibilities under the Act in a manner that harmonizes the Federal trust responsibility to tribes, tribal sovereignty, and statutory missions of the Departments, and that strives to ensure that Indian tribes do not bear a disproportionate burden for the conservation of listed species, so as to avoid or minimize the potential for conflict and confrontation.

Sec. 2. Scope and Limitations. (A) This Order is for guidance within the Departments only and is adopted pursuant to, and is consistent with, existing law.

(B) This Order shall not be construed to grant, expand, create, or diminish any legally enforceable rights, benefits or trust responsibilities, substantive or procedural, not otherwise granted or created under existing law. Nor shall this Order be construed to alter, amend, repeal, interpret or modify tribal sovereignty, any treaty rights, or other rights of any Indian tribe, or to preempt, modify or limit the exercise of any such rights.

(C) This Order does not preempt or modify the Departments' statutory authorities or the authorities of Indian tribes or the states.

(D) Nothing in this Order shall be applied to authorize direct (directed) take of listed species, or any activity that would jeopardize the continued existence of any listed species or destroy or adversely modify designated critical habitat. Incidental take issues under this Order are addressed in Principle 3(C) of Section 5.

(E) Nothing in this Order shall require additional procedural requirements for substantially completed Departmental actions, activities, or policy initiatives.

(F) Implementation of this Order shall be subject to the availability of resources and the requirements of the Anti-Deficiency Act.

(G) Should any tribe(s) and the Department(s) agree that greater efficiency in the implementation of this Order can be achieved, nothing in this Order shall prevent them from implementing strategies to do so.

(H) This Order shall not be construed to supersede, amend, or otherwise modify or affect the implementation of, existing agreements or understandings with the Departments or their agencies,

bureaus, or offices including, but not limited to, memoranda of understanding, memoranda of agreement, or statements of relationship, unless mutually agreed by the signatory parties.

Sec. 3. Definitions. For the purposes of this Order, except as otherwise expressly provided, the following terms shall apply:

(A) The term "Indian tribe" shall mean any Indian tribe, band, nation, pueblo, community or other organized group within the United States which the Secretary of the Interior has identified on the most current list of tribes maintained by the Bureau of Indian Affairs.

(B) The term "tribal trust resources" means those natural resources, either on or off Indian lands, retained by, or reserved by or for Indian tribes through treaties, statutes, judicial decisions, and executive orders, which are protected by a fiduciary obligation on the part of the United States.

(C) The term "tribal rights" means those rights legally accruing to a tribe or tribes by virtue of inherent sovereign authority, unextinguished aboriginal title, treaty, statute, judicial decisions, executive order or agreement, and which give rise to legally enforceable remedies.

(D) The term "Indian lands" means any lands title to which is either: 1) held in trust by the United States for the benefit of any Indian tribe or individual; or 2) held by any Indian tribe or individual subject to restrictions by the United States against alienation.

Sec. 4. Background. The unique and distinctive political relationship between the United States and Indian tribes is defined by treaties, statutes, executive orders, judicial decisions, and agreements, and differentiates tribes from other entities that deal with, or are affected by, the federal government. This relationship has given rise to a special federal trust responsibility, involving the legal responsibilities and obligations of the United States toward Indian tribes and the application of fiduciary standards of due care with respect to Indian lands, tribal trust resources, and the exercise of tribal rights.

The Departments recognize the importance of tribal self-governance and the protocols of a government-to-government relationship with Indian tribes. Long-standing Congressional and Administrative policies promote tribal self-government, self-sufficiency, and self-determination, recognizing and endorsing the fundamental rights of tribes to set their own priorities and make decisions affecting their resources and distinctive ways of life. The Departments recognize and respect, and shall consider, the value that tribal traditional knowledge provides to tribal and federal land management decision-making and tribal resource management activities. The Departments recognize that Indian tribes are governmental sovereigns; inherent in this sovereign authority is the power to make and enforce laws, administer justice, manage and control Indian lands, exercise tribal rights and protect tribal trust resources. The Departments shall be sensitive to the fact that Indian cultures, religions, and spirituality often involve ceremonial and medicinal uses of plants, animals, and specific geographic places.

Indian lands are not federal public lands or part of the public domain, and are not subject to federal public land laws. They were retained by tribes or were set aside for tribal use pursuant to treaties, statutes, judicial decisions, executive orders or agreements. These lands are managed by Indian tribes in accordance with tribal goals and objectives, within the framework of applicable laws.

Because of the unique government-to-government relationship between Indian tribes and the United States, the Departments and affected Indian tribes need to establish and maintain effective working relationships and mutual partnerships to promote the conservation of sensitive species (including

candidate, proposed and listed species) and the health of ecosystems upon which they depend. Such relationships should focus on cooperative assistance, consultation, the sharing of information, and the creation of government-to-government partnerships to promote healthy ecosystems.

In facilitating a government-to-government relationship, the Departments may work with intertribal organizations, to the extent such organizations are authorized by their member tribes to carry out resource management responsibilities.

Sec. 5. Responsibilities. To achieve the objectives of this Order, the heads of all agencies, bureaus and offices within the Department of the Interior, and the Administrator of the National Oceanic and Atmospheric Administration (NOAA) within the Department of Commerce, shall be responsible for ensuring that the following directives are followed:

Principle 1. THE DEPARTMENTS SHALL WORK DIRECTLY WITH INDIAN TRIBES ON A GOVERNMENT-TO-GOVERNMENT BASIS TO PROMOTE HEALTHY ECOSYSTEMS.

The Departments shall recognize the unique and distinctive political and constitutionally based relationship that exists between the United States and each Indian tribe, and shall view tribal governments as sovereign entities with authority and responsibility for the health and welfare of ecosystems on Indian lands. The Departments recognize that Indian tribes are governmental sovereigns with inherent powers to make and enforce laws, administer justice, and manage and control their natural resources. Accordingly, the Departments shall seek to establish effective government-to-government working relationships with tribes to achieve the common goal of promoting and protecting the health of these ecosystems. Whenever the agencies, bureaus, and offices of the Departments are aware that their actions planned under the Act may impact tribal trust resources, the exercise of tribal rights, or Indian lands, they shall consult with, and seek the participation of, the affected Indian tribes to the maximum extent practicable. This shall include providing affected tribes adequate opportunities to participate in data collection, consensus seeking, and associated processes. To facilitate the government-to-government relationship, the Departments may coordinate their discussions with a representative from an intertribal organization, if so designated by the affected tribe(s).

Except when determined necessary for investigative or prosecutorial law enforcement activities, or when otherwise provided in a federal-tribal agreement, the Departments, to the maximum extent practicable, shall obtain permission from tribes before knowingly entering Indian reservations and tribally-owned fee lands for purposes of ESA-related activities, and shall communicate as necessary with the appropriate tribal officials. If a tribe believes this section has been violated, such tribe may file a complaint with the appropriate Secretary, who shall promptly investigate and respond to the tribe.

Principle 2. THE DEPARTMENTS SHALL RECOGNIZE THAT INDIAN LANDS ARE NOT SUBJECT TO THE SAME CONTROLS AS FEDERAL PUBLIC LANDS.

The Departments recognize that Indian lands, whether held in trust by the United States for the use and benefit of Indians or owned exclusively by an Indian tribe, are not subject to the controls or restrictions set forth in federal public land laws. Indian lands are not federal public lands or part of the public domain, but are rather retained by tribes or set aside for tribal use pursuant to treaties, statutes, court orders, executive orders, judicial decisions, or agreements. Accordingly, Indian tribes manage Indian lands in accordance with tribal goals and objectives, within the framework of applicable laws.

Principle 3. THE DEPARTMENTS SHALL ASSIST INDIAN TRIBES IN DEVELOPING AND EXPANDING TRIBAL PROGRAMS SO THAT HEALTHY ECOSYSTEMS ARE PROMOTED AND CONSERVATION RESTRICTIONS ARE UNNECESSARY.

(A) The Departments shall take affirmative steps to assist Indian tribes in developing and expanding tribal programs that promote healthy ecosystems. The Departments shall take affirmative steps to achieve the common goals of promoting healthy ecosystems, Indian self-government, and productive government-to-government relationships under this Order, by assisting Indian tribes in developing and expanding tribal programs that promote the health of ecosystems upon which sensitive species (including candidate, proposed and listed species) depend.

The Departments shall offer and provide such scientific and technical assistance and information as may be available for the development of tribal conservation and management plans to promote the maintenance, restoration, enhancement and health of the ecosystems upon which sensitive species (including candidate, proposed, and listed species) depend, including the cooperative identification of appropriate management measures to address concerns for such species and their habitats.

(B) The Departments shall recognize that Indian tribes are appropriate governmental entities to manage their lands and tribal trust resources. The Departments acknowledge that Indian tribes value, and exercise responsibilities for, management of Indian lands and tribal trust resources. In keeping with the federal policy of promoting tribal self-government, the Departments shall respect the exercise of tribal sovereignty over the management of Indian lands, and tribal trust resources. Accordingly, the Departments shall give deference to tribal conservation and management plans for tribal trust resources that: (a) govern activities on Indian lands, including, for the purposes of this section, tribally-owned fee lands, and (b) address the conservation needs of listed species. The Departments shall conduct government-to-government consultations to discuss the extent to which tribal resource management plans for tribal trust resources outside Indian lands can be incorporated into actions to address the conservation needs of listed species.

(C) The Departments, as trustees, shall support tribal measures that preclude the need for conservation restrictions.

At the earliest indication that the need for federal conservation restrictions is being considered for any species, the Departments, acting in their trustee capacities, shall promptly notify all potentially affected tribes, and provide such technical, financial, or other assistance as may be appropriate, thereby assisting Indian tribes in identifying and implementing tribal conservation and other measures necessary to protect such species.

In the event that the Departments determine that conservation restrictions are necessary in order to protect listed species, the Departments, in keeping with the trust responsibility and government-to-government relationships, shall consult with affected tribes and provide written notice to them of the intended restriction as far in advance as practicable. If the proposed conservation restriction is directed at a tribal activity that could raise the potential issue of direct (directed) take under the Act, then meaningful government-to-government consultation shall occur, in order to strive to harmonize the federal trust responsibility to tribes, tribal sovereignty and the statutory missions of the Departments. In cases involving an activity that could raise the potential issue of an incidental take under the Act, such notice shall include an analysis and determination that all of the following conservation standards have been met: (i) the restriction is reasonable and necessary for conservation of the species at issue; (ii) the conservation purpose of the restriction cannot be achieved by reasonable regulation of non-Indian

activities; (iii) the measure is the least restrictive alternative available to achieve the required conservation purpose; (iv) the restriction does not discriminate against Indian activities, either as stated or applied; and, (v) voluntary tribal measures are not adequate to achieve the necessary conservation purpose.

Principle 4. THE DEPARTMENTS SHALL BE SENSITIVE TO INDIAN CULTURE, RELIGION AND SPIRITUALITY.

The Departments shall take into consideration the impacts of their actions and policies under the Act on Indian use of listed species for cultural and religious purposes. The Departments shall avoid or minimize, to the extent practicable, adverse effects upon the noncommercial use of listed sacred plants and animals in medicinal treatments and in the expression of cultural and religious beliefs by Indian tribes. When appropriate, the Departments may issue guidelines to accommodate Indian access to, and traditional uses of, listed species, and to address unique circumstances that may exist when administering the Act.

Principle 5. THE DEPARTMENTS SHALL MAKE AVAILABLE TO INDIAN TRIBES INFORMATION RELATED TO TRIBAL TRUST RESOURCES AND INDIAN LANDS, AND, TO FACILITATE THE MUTUAL EXCHANGE OF INFORMATION, SHALL STRIVE TO PROTECT SENSITIVE TRIBAL INFORMATION FROM DISCLOSURE.

To further tribal self-government and the promotion of healthy ecosystems, the Departments recognize the critical need for Indian tribes to possess complete and accurate information related to Indian lands and tribal trust resources. To the extent consistent with the provisions of the Privacy Act, the Freedom of Information Act (FOIA) and the Departments' abilities to continue to assert FOIA exemptions with regard to FOIA requests, the Departments shall make available to an Indian tribe all information held by the Departments which is related to its Indian lands and tribal trust resources. In the course of the mutual exchange of information, the Departments shall protect, to the maximum extent practicable, tribal information which has been disclosed to or collected by the Departments. The Departments shall promptly notify and, when appropriate, consult with affected tribes regarding all requests for tribal information relating to the administration of the Act.

Sec. 6. Federal-Tribal Intergovernmental Agreements. The Departments shall, when appropriate and at the request of an Indian tribe, pursue intergovernmental agreements to formalize arrangements involving sensitive species (including candidate, proposed, and listed species) such as, but not limited to, land and resource management, multi-jurisdictional partnerships, cooperative law enforcement, and guidelines to accommodate Indian access to, and traditional uses of, natural products. Such agreements shall strive to establish partnerships that harmonize the Departments' missions under the Act with the Indian tribe's own ecosystem management objectives.

Sec. 7. Alaska. The Departments recognize that section 10(e) of the Act governs the taking of listed species by Alaska Natives for subsistence purposes and that there is a need to study the implementation of the Act as applied to Alaska tribes and natives. Accordingly, this Order shall not apply to Alaska and the Departments shall, within one year of the date of this Order, develop recommendations to the Secretaries to supplement or modify this Order and its Appendix, so as to guide the administration of the Act in Alaska. These recommendations shall be developed with the full cooperation and participation of Alaska tribes and natives. The purpose of these recommendations shall be to harmonize the government-to-government relationship with Alaska tribes, the federal trust responsibility to Alaska tribes and Alaska Natives, the rights of Alaska Natives, and the statutory missions of the Departments.

Sec. 8. Special Study on Cultural and Religious Use of Natural Products. The Departments recognize that there remain tribal concerns regarding the access to, and uses of, eagle feathers, animal parts, and other natural products for Indian cultural and religious purposes. Therefore, the Departments shall work together with Indian tribes to develop recommendations to the Secretaries within one year to revise or establish uniform administrative procedures to govern the possession, distribution, and transportation of such natural products that are under federal jurisdiction or control.

Sec. 9. Dispute Resolution. (A) Federal-tribal disputes regarding implementation of this Order shall be addressed through government-to-government discourse. Such discourse is to be respectful of government-to-government relationships and relevant federal-tribal agreements, treaties, judicial decisions, and policies pertaining to Indian tribes. Alternative dispute resolution processes may be employed as necessary to resolve disputes on technical or policy issues within statutory time frames; provided that such alternative dispute resolution processes are not intended to apply in the context of investigative or prosecutorial law enforcement activities.

(B) Questions and concerns on matters relating to the use or possession of listed plants or listed animal parts used for religious or cultural purposes shall be referred to the appropriate Departmental officials and the appropriate tribal contacts for religious and cultural affairs.

Sec. 10. Implementation. This Order shall be implemented by all agencies, bureaus, and offices of the Departments, as applicable. In addition, the U.S. Fish and Wildlife Service and the National Marine Fisheries Service shall implement their specific responsibilities under the Act in accordance with the guidance contained in the attached Appendix.

Sec. 11. Effective Date. This Order, issued within the Department of the Interior as Order No. 3206, is effective immediately and will remain in effect until amended, superseded, or revoked.

This Secretarial Order, entitled "American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act," and its accompanying Appendix were issued this 5th day of June, 1997, in Washington, D.C., by the Secretary of the Interior and the Secretary of Commerce.

Secretary of the Interior

Secretary of Commerce

Date: June 5, 1997

APPENDIX

Appendix to Secretarial Order issued within the Department of the Interior as Order No. 3206

Sec. 1. Purpose. The purpose of this Appendix is to provide policy to the National, regional and field offices of the U.S. Fish and Wildlife Service (FWS) and the National Marine Fisheries Service (NMFS), (hereinafter "Services"), concerning the implementation of the Secretarial Order issued by the Department of the Interior and the Department of Commerce, entitled "American Indian Tribal Rights, Federal-Tribal Trust Responsibilities, and the Endangered Species Act." This policy furthers the objectives of the FWS Native American Policy (June 28, 1994), and the American Indian and Alaska Native Policy of the Department of Commerce (March 30, 1995). This Appendix shall be considered an

integral part of the above Secretarial Order, and all sections of the Order shall apply in their entirety to this Appendix.

Sec. 2. General Policy. (A) Goals. The goals of this Appendix are to provide a basis for administration of the Act in a manner that (1) recognizes common federal-tribal goals of conserving sensitive species (including candidate, proposed, and listed species) and the ecosystems upon which they depend, Indian self-government, and productive government-to-government relationships; and (2) harmonizes the federal trust responsibility to tribes, tribal sovereignty, and the statutory missions of the Departments, so as to avoid or minimize the potential for conflict and confrontation.

(B) Government-to-Government Communication. It shall be the responsibility of each Service's regional and field offices to maintain a current list of tribal contact persons within each Region, and to ensure that meaningful government-to-government communication occurs regarding actions to be taken under the Act.

(C) Agency Coordination. The Services have the lead roles and responsibilities in administering the Act, while the Services and other federal agencies share responsibilities for honoring Indian treaties and other sources of tribal rights. The Bureau of Indian Affairs (BIA) has the primary responsibility for carrying out the federal responsibility to administer tribal trust property and represent tribal interests during formal Section 7 consultations under the Act. Accordingly, the Services shall consult, as appropriate, with each other, affected Indian tribes, the BIA, the Office of the Solicitor (Interior), the Office of American Indian Trust (Interior), and the NOAA Office of General Counsel in determining how the fiduciary responsibility of the federal government to Indian tribes may best be realized.

(D) Technical Assistance. In their roles as trustees, the Services shall offer and provide technical assistance and information for the development of tribal conservation and management plans to promote the maintenance, restoration, and enhancement of the ecosystems on which sensitive species (including candidate, proposed, and listed species) depend. The Services should be creative in working with the tribes to accomplish these objectives. Such technical assistance may include the cooperative identification of appropriate management measures to address concerns for sensitive species (including candidate, proposed and listed species) and their habitats. Such cooperation may include intergovernmental agreements to enable Indian tribes to more fully participate in conservation programs under the Act. Moreover, the Services may enter into conservation easements with tribal governments and enlist tribal participation in incentive programs.

(E) Tribal Conservation Measures. The Services shall, upon the request of an Indian tribe or the BIA, cooperatively review and assess tribal conservation measures for sensitive species (including candidate, proposed and listed species) which may be included in tribal resource management plans. The Services will communicate to the tribal government their desired conservation goals and objectives, as well as any technical advice or suggestions for the modification of the plan to enhance its benefits for the conservation of sensitive species (including candidate, proposed and listed species). In keeping with the Services' initiatives to promote voluntary conservation partnerships for listed species and the ecosystems upon which they depend, the Services shall consult on a government-to-government basis with the affected tribe to determine and provide appropriate assurances that would otherwise be provided to a non-Indian.

Sec. 3. The Federal Trust Responsibility and the Administration of the Act.

The Services shall coordinate with affected Indian tribes in order to fulfill the Services' trust responsibilities and encourage meaningful tribal participation in the following programs under the Act, and shall:

(A) Candidate Conservation.

(1) Solicit and utilize the expertise of affected Indian tribes in evaluating which animal and plant species should be included on the list of candidate species, including conducting population status inventories and geographical distribution surveys;

(2) Solicit and utilize the expertise of affected Indian tribes when designing and implementing candidate conservation actions to remove or alleviate threats so that the species' listing priority is reduced or listing as endangered or threatened is rendered unnecessary; and

(3) Provide technical advice and information to support tribal efforts and facilitate voluntary tribal participation in implementation measures to conserve candidate species on Indian lands.

(B) The Listing Process.

(1) Provide affected Indian tribes with timely notification of the receipt of petitions to list species, the listing of which could affect the exercise of tribal rights or the use of tribal trust resources. In addition, the Services shall solicit and utilize the expertise of affected Indian tribes in responding to listing petitions that may affect tribal trust resources or the exercise of tribal rights.

(2) Recognize the right of Indian tribes to participate fully in the listing process by providing timely notification to, soliciting information and comments from, and utilizing the expertise of, Indian tribes whose exercise of tribal rights or tribal trust resources could be affected by a particular listing. This process shall apply to proposed and final rules to: (i) list species as endangered or threatened; (ii) designate critical habitat; (iii) reclassify a species from endangered to threatened (or vice versa); (iv) remove a species from the list; and (v) designate experimental populations.

(3) Recognize the contribution to be made by affected Indian tribes, throughout the process and prior to finalization and close of the public comment period, in the review of proposals to designate critical habitat and evaluate economic impacts of such proposals with implications for tribal trust resources or the exercise of tribal rights. The Services shall notify affected Indian tribes and the BIA, and solicit information on, but not limited to, tribal cultural values, reserved hunting, fishing, gathering, and other Indian rights or tribal economic development, for use in: (i) the preparation of economic analyses involving impacts on tribal communities; and (ii) the preparation of "balancing tests" to determine appropriate exclusions from critical habitat and in the review of comments or petitions concerning critical habitat that may adversely affect the rights or resources of Indian tribes.

(4) In keeping with the trust responsibility, shall consult with the affected Indian tribe(s) when considering the designation of critical habitat in an area that may impact tribal trust resources, tribally-owned fee lands, or the exercise of tribal rights. Critical habitat shall not be designated in such areas unless it is determined essential to conserve a listed species. In designating critical habitat, the Services shall evaluate and document the extent to which the conservation needs of the listed species can be achieved by limiting the designation to other lands.

(5) When exercising regulatory authority for threatened species under section 4(d) of the Act, avoid or minimize effects on tribal management or economic development, or the exercise of reserved Indian fishing, hunting, gathering, or other rights, to the maximum extent allowed by law.

(6) Having first provided the affected Indian tribe(s) the opportunity to actively review and comment on proposed listing actions, provide affected Indian tribe(s) with a written explanation whenever a final decision on any of the following activities conflicts with comments provided by an affected Indian tribe: (i) list a species as endangered or threatened; (ii) designate critical habitat; (iii) reclassify a species from endangered to threatened (or vice versa); (iv) remove a species from the list; or (v) designate experimental populations. If an affected Indian tribe petitions for rulemaking under Section 4(b)(3), the Services will consult with and provide a written explanation to the affected tribe if they fail to adopt the requested regulation.

(C) ESA Section 7 Consultation.

(1) Facilitate the Services' use of the best available scientific and commercial data by soliciting information, traditional knowledge, and comments from, and utilizing the expertise of, affected Indian tribes in addition to data provided by the action agency during the consultation process. The Services shall provide timely notification to affected tribes as soon as the Services are aware that a proposed federal agency action subject to formal consultation may affect tribal rights or tribal trust resources.

(2) Provide copies of applicable final biological opinions to affected tribes to the maximum extent permissible by law.

(3)(a) When the Services enter formal consultation on an action proposed by the BIA, the Services shall consider and treat affected tribes as license or permit applicants entitled to full participation in the consultation process. This shall include, but is not limited to, invitations to meetings between the Services and the BIA, opportunities to provide pertinent scientific data and to review data in the administrative record, and to review biological assessments and draft biological opinions. In keeping with the trust responsibility, tribal conservation and management plans for tribal trust resources that govern activities on Indian lands, including for purposes of this paragraph, tribally-owned fee lands, shall serve as the basis for developing any reasonable and prudent alternatives, to the extent practicable.

(b) When the Services enter into formal consultations with an Interior Department agency other than the BIA, or an agency of the Department of Commerce, on a proposed action which may affect tribal rights or tribal trust resources, the Services shall notify the affected Indian tribe(s) and provide for the participation of the BIA in the consultation process.

(c) When the Services enter into formal consultations with agencies not in the Departments of the Interior or Commerce, on a proposed action which may affect tribal rights or tribal trust resources, the Services shall notify the affected Indian tribe(s) and encourage the action agency to invite the affected tribe(s) and the BIA to participate in the consultation process.

(d) In developing reasonable and prudent alternatives, the Services shall give full consideration to all comments and information received from any affected tribe, and shall strive to ensure that any alternative selected does not discriminate against such tribe(s). The Services shall make a written determination describing (i) how the selected alternative is consistent with their trust responsibilities, and (ii) the extent to which tribal conservation and management plans for affected tribal trust resources can be incorporated into any such alternative.

(D) Habitat Conservation Planning.

(1) Facilitate the Services' use of the best available scientific and commercial data by soliciting information, traditional knowledge, and comments from, and utilizing the expertise of, affected tribal governments in habitat conservation planning that may affect tribal trust resources or the exercise of tribal rights. The Services shall facilitate tribal participation by providing timely notification as soon as the Services are aware that a draft Habitat Conservation Plan (HCP) may affect such resources or the exercise of such rights.

(2) Encourage HCP applicants to recognize the benefits of working cooperatively with affected Indian tribes and advocate for tribal participation in the development of HCPs. In those instances where permit applicants choose not to invite affected tribes to participate in those negotiations, the Services shall consult with the affected tribes to evaluate the effects of the proposed HCP on tribal trust resources and will provide the information resulting from such consultation to the HCP applicant prior to the submission of the draft HCP for public comment. After consultation with the tribes and the non-federal landowner and after careful consideration of the tribe's concerns, the Services must clearly state the rationale for the recommended final decision and explain how the decision relates to the Services' trust responsibility.

(3) Advocate the incorporation of measures into HCPs that will restore or enhance tribal trust resources. The Services shall advocate for HCP provisions that eliminate or minimize the diminishment of tribal trust resources. The Services shall be cognizant of the impacts of measures incorporated into HCPs on tribal trust resources and the tribal ability to utilize such resources.

(4) Advocate and encourage early participation by affected tribal governments in the development of region-wide or state-wide habitat conservation planning efforts and in the development of any related implementation documents.

(E) Recovery.

(1) Solicit and utilize the expertise of affected Indian tribes by having tribal representation, as appropriate, on Recovery Teams when the species occurs on Indian lands (including tribally-owned fee lands), affects tribal trust resources, or affects the exercise of tribal rights.

(2) In recognition of tribal rights, cooperate with affected tribes to develop and implement Recovery Plans in a manner that minimizes the social, cultural and economic impacts on tribal communities, consistent with the timely recovery of listed species. The Services shall be cognizant of tribal desires to attain population levels and conditions that are sufficient to support the meaningful exercise of reserved rights and the protection of tribal management or development prerogatives for Indian resources.

(3) Invite affected Indian tribes, or their designated representatives, to participate in the Recovery Plan implementation process through the development of a participation plan and through tribally-designated membership on recovery teams. The Services shall work cooperatively with affected Indian tribes to identify and implement the most effective measures to speed the recovery process.

(4) Solicit and utilize the expertise of affected Indian tribes in the design of monitoring programs for listed species and for species which have been removed from the list of *Endangered and Threatened Wildlife and Plants* occurring on Indian lands or affecting the exercise of tribal rights or tribal trust resources.

(F) Law Enforcement.

(1) At the request of an Indian tribe, enter into cooperative law enforcement agreements as integral components of tribal, federal, and state efforts to conserve species and the ecosystems upon which they depend. Such agreements may include the delegation of enforcement authority under the Act, within limitations, to full-time tribal conservation law enforcement officers.

(2) Cooperate with Indian tribes in enforcement of the Act by identifying opportunities for joint enforcement operations or investigations. Discuss new techniques and methods for the detection and apprehension of violators of the Act or tribal conservation laws, and exchange law enforcement information in general.

Executive Order 13175

Consultation and Coordination With Indian Tribal Governments

By the authority vested in me as President by the Constitution and the laws of the United States of America, and in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes: it is hereby ordered as follows:

Section 1. *Definitions.*

For purposes of this order:

"Policies that have tribal implications" refers to regulations, legislative comments or proposed legislation, and other policy statements or actions that have substantial direct effects on one or more Indian tribes, on the relationship between the Federal Government and Indian tribes, or on the distribution of power and responsibilities between the Federal Government and Indian tribes.

b. "Indian tribe" means an Indian or Alaska Native tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian tribe pursuant to the Federally Recognized Indian Tribe List Act of 1994, 25 U.S.C. 479a.

c. "Agency" means any authority of the United States that is an "agency" under 44 U.S.C. 3502(1), other than those considered to be independent regulatory agencies, as defined in 44 U.S.C. 3502(5).

d. "Tribal officials" means elected or duly appointed officials of Indian tribal governments or authorized intertribal organizations.

Sec. 2. *Fundamental Principles.*

In formulating or implementing policies that have tribal implications, agencies shall be guided by the following fundamental principles:

The United States has a unique legal relationship with Indian tribal governments as set forth in the Constitution of the United States, treaties, statutes, Executive Orders, and court decisions. Since the formation of the Union, the United States has recognized Indian tribes as domestic dependent nations under its protection. The Federal Government has enacted numerous statutes and promulgated numerous regulations that establish and define a trust relationship with Indian tribes.

b. Our Nation, under the law of the United States, in accordance with treaties, statutes, Executive Orders, and judicial decisions, has recognized the right of Indian tribes to self-government. As domestic dependent nations, Indian tribes exercise inherent sovereign powers over their members and territory. The United States continues to work with Indian tribes on a government-to-government basis to address issues concerning Indian tribal self-government, tribal trust resources, and Indian tribal treaty and other rights.

c. The United States recognizes the right of Indian tribes to self-government and supports tribal sovereignty and self-determination.

Sec. 3. *Policymaking Criteria.*

In addition to adhering to the fundamental principles set forth in section 2, agencies shall adhere, to the extent permitted by law, to the following criteria when formulating and implementing policies that have tribal implications:

Agencies shall respect Indian tribal self-government and sovereignty, honor tribal treaty and other rights, and strive to meet the responsibilities that arise from the unique legal relationship between the Federal Government and Indian tribal governments.

b. With respect to Federal statutes and regulations administered by Indian tribal governments, the Federal Government shall grant Indian tribal governments the maximum administrative discretion possible.

c. When undertaking to formulate and implement policies that have tribal implications, agencies shall:

1. encourage Indian tribes to develop their own policies to achieve program objectives;
2. where possible, defer to Indian tribes to establish standards; and
3. in determining whether to establish Federal standards, consult with tribal officials as to the need for Federal standards and any alternatives that would limit the scope of Federal standards or otherwise preserve the prerogatives and authority of Indian tribes.

Sec. 4. Special Requirements for Legislative Proposals.

Agencies shall not submit to the Congress legislation that would be inconsistent with the policymaking criteria in Section 3.

Sec. 5. Consultation.

Each agency shall have an accountable process to ensure meaningful and timely input by tribal officials in the development of regulatory policies that have tribal implications. Within 30 days after the effective date of this order, the head of each agency shall designate an official with principal responsibility for the agency's implementation of this order. Within 60 days of the effective date of this order, the designated official shall submit to the Office of Management and Budget (OMB) a description of the agency's consultation process.

b. To the extent practicable and permitted by law, no agency shall promulgate any regulation that has tribal implications, that imposes substantial direct compliance costs on Indian tribal governments, and that is not required by statute, unless:

1. funds necessary to pay the direct costs incurred by the Indian tribal government or the tribe in complying with the regulation are provided by the Federal Government; or

2. the agency, prior to the formal promulgation of the regulation,

- c. consulted with tribal officials early in the process of developing the proposed regulation;

- d. in a separately identified portion of the preamble to the regulation as it is to be issued in the Federal Register, provides to the Director of OMB a tribal summary impact statement, which consists of a description of the extent of the agency's prior consultation with tribal officials, a summary of the nature of their concerns and the agency's position supporting the need to issue the regulation, and a statement of the extent to which the concerns of tribal officials have been met; and

- e. makes available to the Director of OMB any written communications submitted to the agency by tribal officials.

f. To the extent practicable and permitted by law, no agency shall promulgate any regulation that has tribal implications and that preempts tribal law unless the agency, prior to the formal promulgation of the regulation,

1. consulted with tribal officials early in the process of developing the proposed regulation;

2. in a separately identified portion of the preamble to the regulation as it is to be issued in the Federal Register, provides to the Director of OMB a tribal summary impact statement, which consists of a description of the extent of the agency's prior consultation with tribal officials, a summary of the nature of their concerns and the agency's position supporting the need to issue the regulation, and a statement of the extent to which the concerns of tribal officials have been met; and

3. makes available to the Director of OMB any written communications submitted to the agency by tribal officials.

g. On issues relating to tribal self-government, tribal trust resources, or Indian tribal treaty and other rights, each agency should explore and, where appropriate, use consensual mechanisms for developing regulations, including negotiated rulemaking.

Sec. 6. Increasing Flexibility for Indian Tribal Waivers.

Agencies shall review the processes under which Indian tribes apply for waivers of statutory and regulatory requirements and take appropriate steps to streamline those processes.

b. Each agency shall, to the extent practicable and permitted by law, consider any application by an Indian tribe for a waiver of statutory or regulatory requirements in connection with any program administered by the agency with a general view toward increasing opportunities for utilizing flexible policy approaches at the Indian tribal level in cases in which the proposed waiver is consistent with the applicable Federal policy objectives and is otherwise appropriate.

c. Each agency shall, to the extent practicable and permitted by law, render a decision upon a complete application for a waiver within 120 days of receipt of such application by the agency, or as otherwise provided by law or regulation. If the application for waiver is not granted, the agency shall provide the applicant with timely written notice of the decision and the reasons therefor.

d. This section applies only to statutory or regulatory requirements that are discretionary and subject to waiver by the agency.

Sec. 7. Accountability.

In transmitting any draft final regulation that has tribal implications to OMB pursuant to Executive Order 12866 of September 30, 1993, each agency shall include a certification from the official designated to ensure compliance with this order stating that the requirements of this order have been met in a meaningful and timely manner.

b. In transmitting proposed legislation that has tribal implications to OMB, each agency shall include a certification from the official designated to ensure compliance with this order that all relevant requirements of this order have been met.

c. Within 180 days after the effective date of this order the Director of OMB and the Assistant to the President for Intergovernmental Affairs shall confer with tribal officials to ensure that this order is being properly and effectively implemented.

Sec. 8. Independent Agencies.

Independent regulatory agencies are encouraged to comply with the provisions of this order.

Sec. 9. General Provisions.

This order shall supplement but not supersede the requirements contained in Executive Order 12866 (Regulatory Planning and Review), Executive Order 12988 (Civil Justice Reform), OMB Circular A-19, and the Executive Memorandum of April 29, 1994, on Government-to-Government Relations with Native American Tribal Governments.

b. This order shall complement the consultation and waiver provisions in sections 6 and 7 of Executive Order 13132 (Federalism).

c. Executive Order 13084 (Consultation and Coordination with Indian Tribal Governments) is revoked at the time this order takes effect.

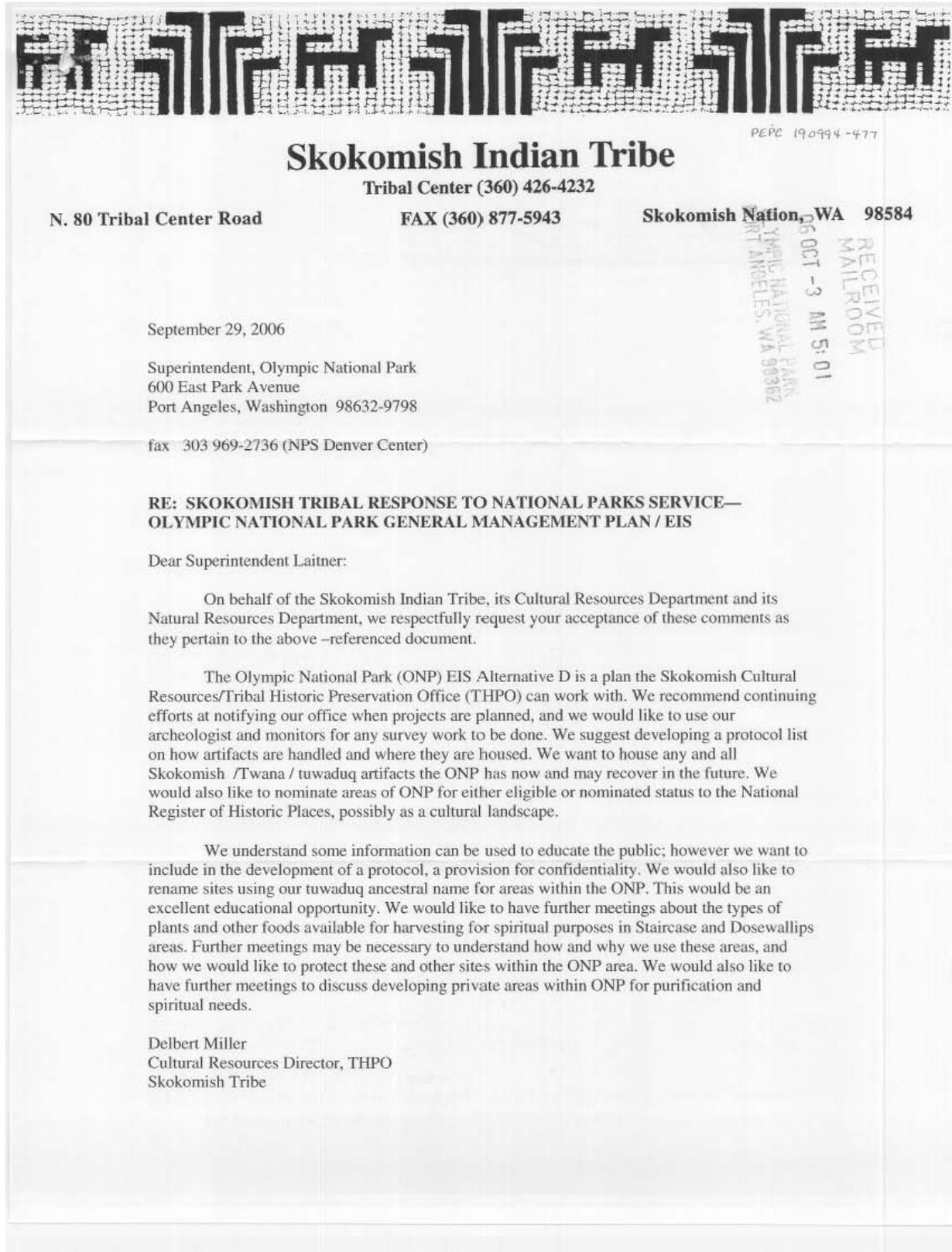
d. This order shall be effective 60 days after the date of this order.

Sec. 10. Judicial Review.

This order is intended only to improve the internal management of the executive branch, and is not intended to create any right, benefit, or trust responsibility, substantive or procedural, enforceable at law by a party against the United States, its agencies, or any person.

William J. Clinton
The White House,
November 6, 2000.

Comment 477-Skokomish Indian Tribe



Skokomish Indian Tribe

Tribal Center (360) 426-4232

N. 80 Tribal Center Road

FAX (360) 877-5943

Skokomish Nation, WA 98584

PEPC 190994-477

September 29, 2006

Superintendent, Olympic National Park
600 East Park Avenue
Port Angeles, Washington 98632-9798

fax 303 969-2736 (NPS Denver Center)

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OLYMPIC NATIONAL PARK
PORT ANGELES, WA 98362

**RE: SKOKOMISH TRIBAL RESPONSE TO NATIONAL PARKS SERVICE—
OLYMPIC NATIONAL PARK GENERAL MANAGEMENT PLAN / EIS**

Dear Superintendent Laitner:

On behalf of the Skokomish Indian Tribe, its Cultural Resources Department and its Natural Resources Department, we respectfully request your acceptance of these comments as they pertain to the above –referenced document.

The Olympic National Park (ONP) EIS Alternative D is a plan the Skokomish Cultural Resources/Tribal Historic Preservation Office (THPO) can work with. We recommend continuing efforts at notifying our office when projects are planned, and we would like to use our archeologist and monitors for any survey work to be done. We suggest developing a protocol list on how artifacts are handled and where they are housed. We want to house any and all Skokomish /Twana / tuwaduq artifacts the ONP has now and may recover in the future. We would also like to nominate areas of ONP for either eligible or nominated status to the National Register of Historic Places, possibly as a cultural landscape.

We understand some information can be used to educate the public; however we want to include in the development of a protocol, a provision for confidentiality. We would also like to rename sites using our tuwaduq ancestral name for areas within the ONP. This would be an excellent educational opportunity. We would like to have further meetings about the types of plants and other foods available for harvesting for spiritual purposes in Staircase and Dosewallips areas. Further meetings may be necessary to understand how and why we use these areas, and how we would like to protect these and other sites within the ONP area. We would also like to have further meetings to discuss developing private areas within ONP for purification and spiritual needs.

Delbert Miller
Cultural Resources Director, THPO
Skokomish Tribe

Additional natural resources issues brought forward during discussions from July 12, 2006:

The EIS / Draft Plan states ONP will continue to provide certain protective mechanisms to varied resources of concern to the Tribe, consistent with treaty rights issues. Individual tribal members should not be expected to have their access or treaty-protected activities restricted or regulated. The Skokomish Tribe concurs with the Preferred Alternative D identified in the Plan.

The current Olympic National Park was a former National Monument, its nearly million-acre landscape resides at the center of the Olympic Peninsula. But prior to any federal or state designations, the area was and continues to be part of the usual and accustomed areas of the Skokomish, as it has *since time immemorial*. It is the Tribe's desire to be more involved and provide comments on Park projects. The Tribe anticipates more collaborative and cooperative opportunities with the Park. The Skokomish Tribe acknowledges the other tribes affected by the Park, and supports their sovereign abilities to communicate their concerns with the Park. The Skokomish Indian Tribe may share certain concerns with other tribes, but government-to-government relationships are expected to be honored, including opportunities for consultations.

Superintendent Laitner expressed the Park "would certainly like to work more with the Tribe. If we had a project on the east side of the park, we would notify the Tribe for initial feedback. If the Tribe wishes, we could have a tribal member on site during project work, and we would have a plan for discovery. We also could provide a follow-up report". As mentioned in the previous comment by Delbert Miller, the Tribe would like to implement the appropriate protocols and methodologies that could include on-site observers, plans for inadvertent discovery and reporting requirements, and identifying certain sites for ceremonial and spiritual purposes.

When asked about ONP identifying any ethnographic resources found eligible as cultural landscapes, your response was "No, not as cultural landscapes. We could evaluate them with the Traditional Cultural Property (TCP) criteria though, if the Tribe would like them evaluated" and ONP would be interested in working with the Tribe. The Tribe expects such interactive dialogues.

As discussed in our meeting, the Tribe is very interested in the reconstruction of the pedestrian bridge at Staircase, as it provides access to traditional areas for the tribal community, including its elders. The Tribe agreed to work collaboratively with Park staff to assist them in soliciting certain funding support for the project and rebuilding the bridge. Park staff commented that unfortunately, fire suppression needs tend to outweigh this bridge reconstruction as the fiscal years' end. The Tribe believes if the bridge is part of the Preferred Alternative D, it should not be weighted against fire suppression, but treated as both a cultural and recreational enhancement.

Final comments related to natural resource issues are addressed by two critical elements taking place within the Skokomish watershed. The Tribe believes they require Park consideration. These elements were not brought up in our discussions but are related to others, and to each other.

The Tribe co-manages the fisheries and associated habitat with the Washington Department of Fish and Wildlife, (WDFW) within our usual and accustomed area as defined by the 1855 Treaty of Point No Point, later affirmed in *US v Washington*, and referred as the Boldt Decisions. The co-managers determined a Skokomish Salmon Recovery Plan is to be developed this year, with an emphasis on the ESA-listed stocks, including Puget Sound Chinook, Hood Canal summer chum and coastal bull trout, but addressing all salmonids. Coastal steelhead are also proposed for listing. This product is in development and can benefit from fruitful dialogue with Park staff. Landlocked salmonids in Lake Cushman and Park waters do not have the access opportunities to pursue the anadromous characteristics associated with life history behaviors.

Department of Interior 4(e) conditions include supporting flow regime modifications, and fish passage past the two Cushman dams, in addition to other critical watershed enhancements. The implementation of these 4(e) conditions has long been a goal of supporting restoration of full watershed integrity in its entirety, from the Skokomish estuary and delta to the headwaters of all basin tributaries. Such access includes passage past the dams that block the salmonids' ability to exhibit their anadromous characteristics. Such blockages have violated the Federal Power Act for 70+ years. Along with the out-of-basin diversion of the North Fork Skokomish, the fisheries and associated habitat have been deleteriously affected, challenging the treaty rights of the Tribe.

These 4(e) conditions are critical to treaty rights protection. The Skokomish Indian Tribe believes the Olympic National Park, as a representative of the federal fiduciary trust relationship to the Tribe, is obligated to support the Tribe in this regard. Such support for the 4(e) conditions should have no direct bearing on the Park, its Management Plan EIS or Preferred Alternative D. In fact, it is a mutual collaborative opportunity that may have certain pro-active bearing upon the Park, its waters, organisms, and adaptive management strategies for full watershed restoration.

The Skokomish Indian Tribe believes increasing dialogue and communication, may help facilitate such reciprocal objectives with common goals and outcomes, particularly within a fisheries utilization framework. Olympic National Park landscapes provide the potential template for relative pristine conditions and index areas, that can be used to monitor and track restoration trajectories, and offer specific opportunities in adaptive management, within a framework of cultural protection, environmental education, and stewardship. The Tribe believes ecological restoration is not mutually exclusive of cultural restoration. Certain synergies exhibited between and among these issues, and the anticipated increased dialogues, support pro-active pursuits.

Thank you for accepting these comments. Please do not hesitate to contact the Tribe for further information, clarification, or to schedule follow-up discussions that include consultations.

Sincerely,



Keith Dublanica, Director
Skokomish Natural Resources
(360) 877 -2110 x457

cc: Denese LaClair, Tribal Council Chair
Dave Herrera, Policy Representative
Brian Collins, Senior Tribal Attorney
Jonathan Wolf, Fisheries Manager
Nancy Hendricks, ONP

Businesses

Comment 269-Aramark Lake Quinault Lodge

PEPC 190705-269 ✓

Olympic National Park
Draft General Management Plan
Summer 2006

National Park Service
U.S. Department of the Interior



COMMENT SHEET ONP - GMP

We welcome your comments on this project. The comment period closes on 09/15/2006. Your comments must be delivered or postmarked no later than 09/15/2006.

You may complete this form and provide it to the NPS at one of the open houses, or you may send this form and/or your letter to:
National Park Service
Denver Service Center - Cliff Hawkes, DSC-P
12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225-9901

It is the practice of the NPS to make comments, including names, home addresses, home phone numbers, and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives of or officials of organizations or businesses, available for public inspection in their entirety

Personal Information

First Name: KEIS Middle Initial: MI

Last Name: DAHL

Organization: ARAMARK LAKE QUINAULT LODGE

Address 1: P.O. BOX 7

Address 2: 345 S. SHOCE RD.

City: QUINAULT State/Province: WA

Postal Code: 98575

E-mail: DAHL-KEISH@ARAMARK.COM

Keep my contact information private. Provide justification:

Please use below and the back of the paper for your comments. Attach extra sheets as necessary. Please print or write clearly.

QUINAULT AREA: THE NEED FOR A RANGER FOR THE INTERPRETIVE PROGRAM IS GREAT. THE VISITORS HAVE NOTICED NO RANGERS FOR GUIDED HIKE AND EDUCATIONAL PROGRAMS.

BIKE LANE NEEDED AT WEST CLIFFS TO ALL BUSINESSES. HIGH VOLUMES OF BIKES GO THROUGH THIS AREA IN THE SUMMER TIME.

Comment 284-Fineline Press

PEPC 190721-284

Olympic National Park
Draft General Management Plan
 Summer 2006

National Park Service
 U.S. Department of the Interior



COMMENT SHEET ONP - GMP

We welcome your comments on this project. The comment period closes on 09/15/2006. Your comments must be delivered or postmarked no later than 09/15/2006.

You may complete this form and provide it to the NPS at one of the open houses, or you may send this form and/or your letter to:

National Park Service
 Denver Service Center - Cliff Hawkes, DSC-P
 12795 West Alameda Parkway
 PO Box 25287
 Denver, CO 80225-9901

RECEIVED
 AUG 22 2006
 DSC-P

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Personal Information

First Name: *DANIEL* Middle Initial: *E.*

Last Name: *BARR*

Organization: *FINELINE PRESS*

Address 1: *610 FRONTIER STREET*

Address 2:

City: *CLALLAM BAY* State/ Province: *WASHINGTON STATE*

Postal Code: *98326-0363*

E-mail: *DAUBARR@STNZ.COM*

Keep my contact information private. Provide justification:

Please use below and the back of the paper for your comments. Attach extra sheets as necessary. Please print or write clearly.

I SUPPORT PLAN D - WITH AN EMPHASIS (I RECOMMEND) ON PRE-SERVING AND RESTORING BIRD HABITAT IN PARK / FOREST AREAS ACCESSIBLE TO TOURISTS. THANK YOU.

Comment 285-Fineline Press

PEPC 190722-285

Olympic National Park Draft General Management Plan

Summer 2006

National Park Service
U.S. Department of the Interior



COMMENT SHEET ONP - GMP

We welcome your comments on this project. The comment period closes on 09/15/2006. Your comments must be delivered or postmarked no later than 09/15/2006.

You may complete this form and provide it to the NPS at one of the open houses, or you may send this form and/or your letter to:

National Park Service
Denver Service Center - Cliff Hawkes, DSC-P
12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225-9901

RECEIVED

AUG 22 2006

DSC-P

It is the practice of the NPS to make comments, including names, home addresses, home phone numbers, and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives of or officials of organizations or businesses, available for public inspection in their entirety

Personal Information

First Name: DONNA Middle Initial J
Last Name: BARR
Organization: A FINE LINE PRESS
Address 1: PO BOX 363
Address 2: 610 FRONTIER
City: CLALLAM BAY, WA State/ Province WA
Postal Code: 98326
E-mail: barr@stinz.com

Keep my contact information private. Provide justification:

Please use below and the back of the paper for your comments. Attach extra sheets as necessary. Please print or write clearly.

Keep in mind, the West End Resident population all have some creative talent, and are open to developing the arts to take advantage of the worlds biggest industry: arts, entertainment & media. This will support tourism and the healing of over-used resources, and provide employment through the internet - for worldwide companies. Develop tourism for a place to breathe, not a place tourist trap. Lighten the human footprint by wise, careful energy use & production (such as diesel-veg, oil conversion). The people here have vision and talent - use it to save what we have for future generations.
*local

Comment 441–Green Crow Corporation

PEPC 190939
441

Comments on the May 2006 “Draft General Management Plan & Environmental Impact Statement” for the Olympic National Park.

By Harry Bell, Chief Forester

Green Crow Corporation

September 27, 2006

These comments focus only on the proposed boundary changes in the Lake Ozette and Lake Crescent areas and on the proposed 44,000-acre purchase and exchange lands in the Lake Ozette drainage. Regarding the development of facilities for the benefit of “front country” users we generally support alternative C without the road and faculty removals or the boundary expansion.

LAKE OZETTE BOUNDARY CHANGES (Alternatives B, C, and D)

Attached is a paper, written by Dr James Rochelle, providing scientific arguments showing that virtually all of the ecological benefits that are expected form ONP expansion are already being addressed by the State of Washington Forest Practices Laws and the Programmatic HCP including the Monitoring and Adaptive Management elements. Following are additional comments on ecological, economic and social issues.

Ecological Issues

Since 2001 I have been an active member of what is now the Lake Ozette Sockeye Recovery Plan Steering Committee. Other committee representatives are from ONP, Indian Tribes, Clallam County, EPA, NOAA, private landowners and several State Agencies. Until 2006 our focus was on listing the factors limiting the recovery of sockeye and evaluating the supporting evidence that indicates that these factors have been or still are limiting. We are now developing the recovery plan. During this entire effort the ONP representatives have demonstrated an enormous disconnect with the existing ecological protection and management activities outside of the ONP boundaries. This disconnect is obvious throughout the Draft General Management Plan Document and is particularly demonstrated in the chapter entitled “Relationship of Other Planning Efforts To This General Management Plan.” Neither the state HCP, the state forest practices laws nor the state forest practices rules are referenced in this chapter. As shown in the attached paper, an honest presentation of the benefits of these existing policies shows that virtually all of the ecological reasons for park boundary expansion (listed on page 370 of the proposed plan) have already been fixed.

NOAA and the Recovery Plan Steering Committee are now developing the recovery plan for Sockeye, which will include recognition of the State HCP. For successful recovery of Sockeye, three additional things appear to be necessary within the *current* park boundaries—none of which are likely under the parks “wilderness” mandate. 1) Eliminate or significantly reduce predation by seals, river otters, cutthroat trout and pike minnows in the lake and the Ozette River, 2) Relocate enough large woody debris in the Ozette River to re-elevate the lake to its natural level, 3) Clean the lake gravels that have been silted in from tributary incising caused by the lower lake levels caused by removal of woody

debris from the Ozette River. The ONP plan should allow these restoration projects to happen so that lake spawning sockeye populations can recover. Expanding the park boundaries will do nothing to fix these problems.

Since 1977, when the ONP last expanded its boundaries to include most of the lake shoreline, virtually nothing but finger pointing has been done to address sockeye recovery. This is an example of what might be expected under park management in the proposed expansion in the Lake Ozette Watershed. The ONP's recent catch and release policy for cutthroat trout—which are a demonstrated predator on Sockeye fry—is actually working against sockeye recovery.

In contrast, private timberland owners have provided increasing protection measures for both fish habitat and water quality. In the Ozette drainage nearly 20% of the private land ownership is in stream or wetland protection zones restricted from timber harvest by state laws. We enhance biological diversity by providing a much broader spectrum of habitats for a much broader spectrum of wildlife than the old growth and passive wilderness management typical of the ONP. Additionally, forest landowners are upgrading roads even though there is virtually no conclusive empirical data suggesting that these roads are having a measurable impact on water quality or sockeye recovery. These things will not happen under park service management.

Economic Issues

With two kids in public school my wife and I are acutely aware of the losing financial struggle of the school districts on the North Olympic Peninsula. Here in Port Angeles one school closed and at least one more will close. Other school districts to the west are having similar financial challenges. The primary reason is that enrolments are down because family wage jobs are on the decline. The Northwest Forest Plan devastated hundreds of families because—unlike most other national forests—the Olympic National Forest has no matrix lands under the plan. Ripple economic effects, including the closure of several saw mills and the Rayonier Pulp Mill, have caused the loss of many more family wage jobs. The recent influx of wealthy retirees and scattering of low wage tourism jobs have done little to offset this problem. People work and shop at Wal-Mart because they have no choice. We are still in economic decline and the ONP expansion will likely contribute to this downward trend. While ONP emphasizes that the boundary expansion does not change ownership, the 1976 federal legislation that previously expanded the ONP clearly indicates that the intent was to buy from willing sellers and then to acquire the remainder by condemnation.

The sustainable and multiple use management of the private timberlands have, to some degree, mitigated these impacts by providing family wage jobs from timber harvest. Green Crow timber harvest in the Lake Ozette and Lake Crescent watersheds contributes several million dollars a year to the various foresters, loggers, truckers, road builders and tree planters.

Aside from the likelihood of another trust beneficiary lawsuit, a much bigger economic impact is likely if the proposed 44,000 acres of private land becomes state managed “Legacy Forests”—especially if these lands are constrained by Forest Stewardship Council certification. Jobs will be lost. Schools and junior taxing districts will suffer.

Last, private timberland that falls within the park boundaries immediately loses value because of the Washington State Environmental Policy (SEPA) and state forest practices acts. Under these policies the ONP has a say on when, where and how private timber is managed. Even if the ONP is politically sensitive enough to not do this, the SEPA process gives any anti-timber or pro-park organization—for example the Wilderness Watch, Olympic Park Associates, National Parks and Conservation Association or the Public Employees for Environmental Responsibilities, who are using the Wilderness Act to challenge the ONP's plans to protect cultural resources—a very convenient and inexpensive appeals process that will gridlock any private forest timber harvest plans. Not only will we become a “willing” seller, but we will also be compelled to sell at significantly reduced prices. This is because the yellow book federal appraisal guidelines require valuation net of regulatory restrictions. In effect the ONP or pro-park organizations can influence the land and timber valuation.

Social Issues

On the private timberlands that ONP would like to “purchase” or lock up into “Legacy Forest” we practice sustainable consumptive use. That is, people catch fish—and keep them—and hunt for both recreation and subsistence. These important Tribal and local cultural activities will most certainly cease under ONP management. A current example is the ONP's catch and release policy for Cutthroat Trout in Lake Ozette and Lake Crescent. There is no data that indicates that these populations are even remotely at risk. Yet national park policy has stopped this valuable recreational and cultural activity.

Since the creation of the ONP there have been periodic episodes of park expansion. Each time more multiple use lands are lost to wilderness, more families are displaced and taxpayers are saddled with additional forever-increasing cost of park management. This trend raises the rhetorical question: Is the long-term goal of the National Park Service to minimize human occupancy, and control those left, on the Olympic Peninsula? The trend suggests an affirmative answer.

Conclusion

There is a clear contrast between the National Park Service preservation philosophies—as exemplified by the Wilderness Act and the park's management activities—and the private land multiple use philosophy embodied in the Washington State Habitat Conservation Plan and private forest landowner's management activities. On the Olympic Peninsula we have an enormous land base committed to providing wilderness benefits. At the same time we are enormously lacking—and continually losing the land base necessary to fulfill our social, cultural and economic needs. Every acre of National Park expansion has a disproportionate negative impact on middle and working class families. On ecological, issues the benefits are small to nonexistent relative to current management. On the social and economic issues, the park expansion plans are clearly and grossly negative. **For these reasons we oppose any boundary expansion of the ONP and the purchase and exchange of the proposed 44,000 acres.**

Comment 547–Green Crow Corporation

PEPC 191179 -547

GREEN CROW

805 E. 8th • P.O. Box 2469
Port Angeles, WA 98362-0074
(360) 452-3325 • FAX (360) 417-3676



Re: Comments on the Olympic National Park Proposed General Management Plan

The following comments are being submitted on behalf of Green Crow, a Port Angeles based family owned company that has been in the timber business for many years.

As background, we as a company sincerely care about our community and believe that we should give back to those that have helped make us successful. This includes the 140 employees directly employed by Green Crow through its various companies or partnerships, and the other approximate 300 additional truck-drivers, mill-workers, foresters, road builders, etc. that are employed with family wage jobs that provide essential services so that we may operate. Most of these employees reside on the Olympic Peninsula.

We also appreciate the fact that we have the Olympic National Park in our backyard.

The comments in this letter are more general in nature since comments already submitted by our research biologist, chief forester, and WFPA are very focused and specific.

--First, our company was and is upset by the method the ONP used to convey their thoughts regarding proposed changes with their neighbors. The first time we saw anything about this current recommended proposal was a headline in the local paper. This is a great way to treat your neighbors!

---Second, there are numerous conclusions throughout the document that have little or no factual or scientific basis. The ONP does not seem to have to abide by the rules requiring economic or scientific peer review when promulgating a position and the authors of the document should state these items as opinions and not facts if in fact there is little statistical validity. Others have highlighted many of these inaccuracies, but just a few egregious examples include the following:

- 1) Summary of comparative costs (page 64) gives a range of estimates for the addition property to expand the ONP boundary and add the acquisition of additional property and for the exchange of mineral rights. Since our company has evaluated and been involved in almost all major timberland acquisitions in the States of California, Oregon and Washington for the past ten years, these numbers do not even begin to reflect reality. Our best estimate of cost would be \$150 to \$200 million for the acquisition of the property outlined in this document. What kind of cost benefit would result from this acquisition? Since there is a large backlog of other unfounded projects, is this the best use of the limited financial resources of the ONP?
- 2) A large component of the economic benefit from Alternative C and D in the ONP planning document is the increased recreation visits to the Park. Based on the ONP projection (page 173), there is an upward trend in visitation with a very low correlation coefficient and therefore little statistical accuracy. However, if one used the data beginning in 1995 through the current year, there would instead be a negative trend line showing even fewer ONP visitors. This negative trend line would be more appropriate given the data for the other U.S. National Parks where there has been a drop in visitation by 25% over the past sixteen years. (You should read the article in the Washington Post on July 5th, 2006 regarding "Videophilia Keeps Americans Indoors"). If one instead believes the resulting negative trend line beginning in 1996, there would be little or no

economic benefit to the Park proposed expansions under any alternative. Except at ONP's hypothetical macro-economic level, there is little reason to believe that any of these proposed expansion plans would result in any additional economic benefit. If examined on a specific project basis, we do not believe that there would be any economic benefits to any expansion. In fact, the resulting loss in family jobs based on less timber harvest would result based on our projections in 600 to 900 fewer family wage jobs.

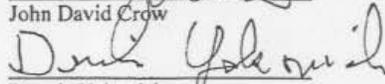
- 3) The Analysis of Boundary Adjustment and Land Protection Criteria (pages 369 to 372) is particularly flawed. As has been addressed by our biologist and chief forester, this and many, (many, many) other parts of this plan fail to recognize the benefits of private forestland being managed under the State of Washington's Habitat Conservation Plan and the Washington Forest Practices Laws. We as a company believe that the protection of critical wildlife habitat and the protection of traditional land uses are not mutually exclusive concepts. In fact, private forestland will provide a much greater benefit to elk; deer, bear and many small animals then will be found in the ONP on their unmanaged regime. In addition, we as a company have set aside approximately 20% of our land for protection of riparian dependent species at a considerable financial cost. Finally, we are on a program to finish our "Road Maintenance and Abandonment Plan" for the benefit of fish and other riparian species within the next nine years. As an example, our company is spending approximately \$1.0 million dollars this year on culverts, bridges and roads strictly to improve fish habitat. The ONP cannot currently fund programs needing maintenance within their current Park boundary, and why would anyone believe that they would improve in the future with additional capital requirements.

Therefore after much soul searching and because we all care about the economic health of this area, we find ourselves unable to recommend any alternative but A.

Thank you for accepting our comments.


Randall S. Johnson


John David Crow


Dennis Yakovich

Comment 451-Interfor Pacific



PEPC 190949-451

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OCT - 5 2006
DSC-P

September 27, 2006

Ms. Carla McConnell
Olympic National Park GMP
US National Park Service
Denver Service Center Planning
PO Box 25287
Denver, CO 80225

Dear Ms. McConnell:

In September 2004, Interfor Pacific Inc. purchased a sawmill from Crown Pacific, which is located in Clallam County, at milepost 243701 Highway 101 West, Port Angeles, WA.

Interfor Pacific Inc. completed the acquisition of this mill with the belief there was an adequate private timber supply to sustain its investment. Interfor Pacific is now in the process of a \$20 million dollar upgrade to the Port Angeles facility. When the upgrade is complete, the mill will employ approximately 113 people. This is an increase from 88 current employees who maintain family-wage jobs, with excellent benefits.

Several timber companies have made major capital investments in Olympic Peninsula area facilities. The companies include Interfor Pacific, Simpson Timber, Sierra Pacific, and Mason County as well. They all survive because of private timberlands; not government timber.

In 2005, Interfor Pacific purchased logs delivered directly from the following landowner tree farms:

Rayonier	9,109,000 bf
Green Grow, Cascade Timberlands	15,252,000 bf
Merrill & Ring	<u>5,921,000 bf</u>
Total	30,282,000 bf

In addition, Interfor Pacific purchased in excess of 20 million board feet from the above tree farms in the form of timber sales sold by those tree farms, and delivered to Interfor Pacific by way of small independent loggers.

Our facility processes logs with a maximum butt diameter of 16 inches, and a minimum top diameter of 5 inches; second and third growth only. These are 30 to 50 year old sustainable forests with a short rotation age; exactly what you would take away from the current owners and our timber supply, now, and in the future.

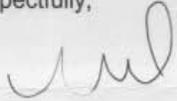
Interfor Pacific Inc. ♦ 2211 Rimland Drive, Suite 220 ♦ Bellingham, WA 98226

employees in serious jeopardy.

Thank you for taking our concerns into consideration.

Should you have any questions, please feel free to contact me at 360-791-7058.

Respectfully,



Rick O. Forgaard
Operations Manager
Interfor Pacific Inc.

Interfor Pacific Inc. ♦ 2211 Rimland Drive, Suite 220 ♦ Bellingham, WA 98226

Comment 234-Lazelle Nature Photography

PEPC 190650 - 234

Name: Keith D. Lazelle
Organization: Lazelle Nature Photography
Organization Type: I - Unaffiliated Individual
Address: P.O. Box 192
1634 Toandos Road
Quilcene, WA 98376
USA
E-mail: lazelle@waypt.com

Correspondence Information

Status: Reviewed **Park Correspondence Log:** 190650
Date Sent: 09/21/2006 **Date Received:** 09/21/2006
Number of Signatures: 1 **Form Letter:** Yes (Master)
Contains Request(s): No **Type:** Web Form
Notes:

Correspondence Text

PLEASE defer all decisions relating to wilderness until a comprehensive wilderness management plan is completed and available for public review.

PLEASE keep developed areas at their current size as described in alternative A. New developments should remain OUTSIDE the national park.

PLEASE restore species like the wolf and fisher.

PLEASE establish river protection zones to ensure critical salmon habitats and natural river processes as proposed in Alternative B and design all 13 eligible rivers for federal Wild & Scenic river designation.

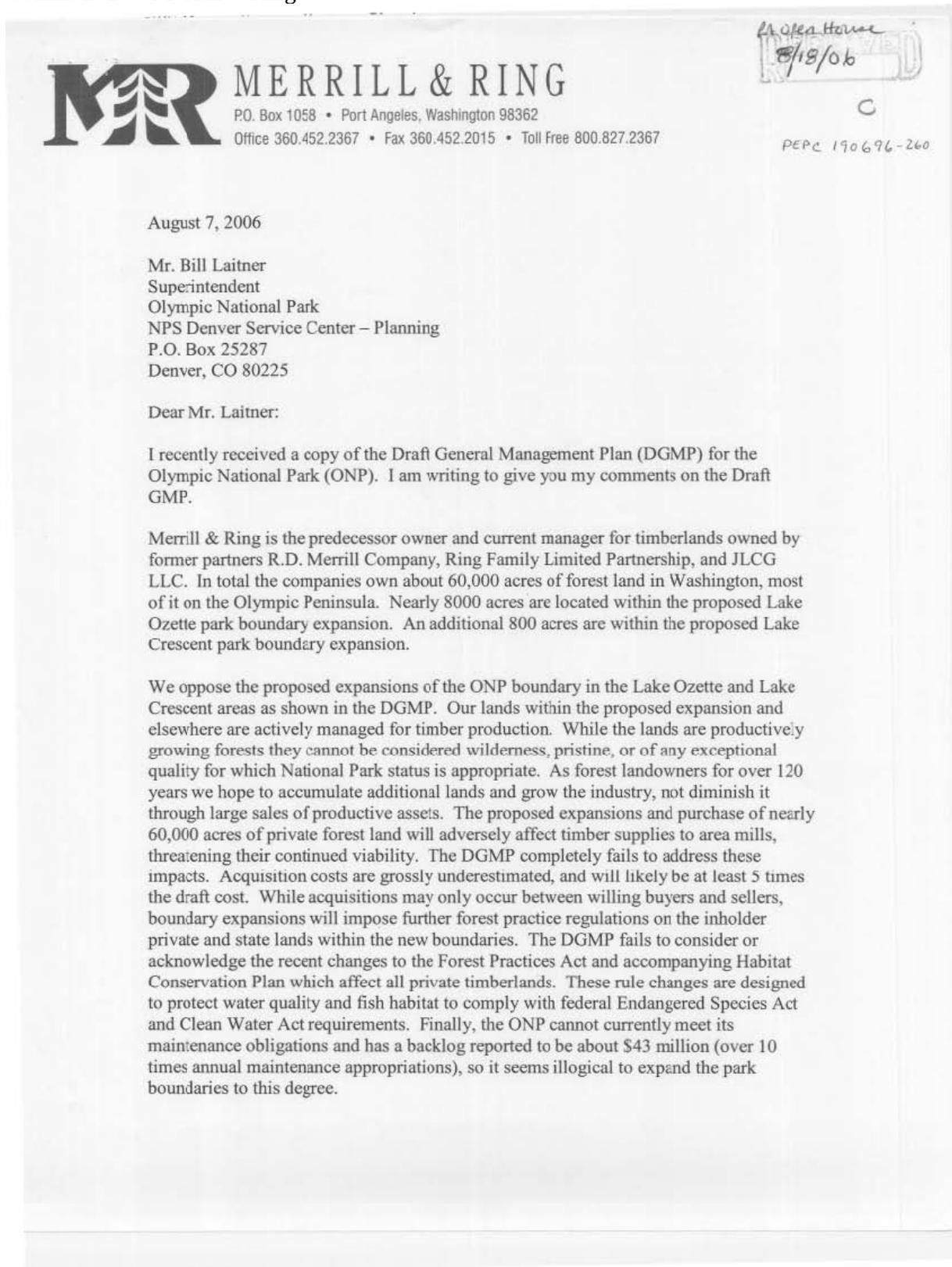
PLEASE expand park boundaries in five areas - Ozette Lake, Lake Crescent, Hoh, Queets and Quinault watersheds) to protect critical habitats for salmon and wildlife as proposed in Alternative B.

Olympic National Park's HIGHEST PRIORITY should be preserving its natural systems, restoring threatened wildlife and protecting the integrity of its world-class wilderness.

Thank you for reviewing my comment. I would like to also take time to thank you for establishing intertidal reserves on the Olympic Coast and recommending wilderness study for Ozette Lake!

Sincerely,
Keith D. Lazelle

Comment 260–Merrill & Ring



My detailed comments follow and refer to the DGMP page and paragraph/ table as noted. Some of the comments are repetitive in order to address each reference in the DGMP.

Page 34-35 – Lake Crescent Boundary Adjustments

R.D. Merrill Company owns approximately 800 acres within the proposed boundary expansion. An additional 160 acres are accessed by a road system that falls within the proposed expansion. Merrill's lands contain mature second growth timber planned for harvest and long-term management under our sustained yield harvest plan. All forest practices are regulated by the Washington Forest Practices Act. The rules and regulations recently received federal recognition in a Habitat Conservation Plan for compliance with the Endangered Species Act. The rules require significant buffers on all fish streams and non-fish perennial streams. Roads must be maintained to meet Clean Water Act requirements, including control of sedimentation and provision for fish passage at all stream crossings.

Merrill's lands are part of the Boundary Creek watershed and do not flow into Lake Crescent, home to Beardslee and Crescentii Trout. Forest Practices Act rules require landowners to upgrade all roads to current rule standards by 2016, or sooner if the road is used for hauling of forest products. These rules and timelines will likely result in better maintenance by Merrill than by the ONP, given ONP's current maintenance backlog.

Page 35-36 – Lake Ozette Boundary Adjustments

R.D. Merrill Company, Ring Family Limited Partnership and JLCG LLC all own lands within the proposed Lake Ozette boundary expansion, totaling about 8000 acres in Alternative B and about 5000 acres in Alternatives C and D. The lands contain a range of forest stands ranging from young reproduction to mature second growth timber planned for harvest under our sustained yield harvest plans. Contrary to the DGMP these lands do not provide a "natural setting" but have for many decades been part of long-term management. The existing scenic qualities, as viewed from Lake Ozette or elsewhere, reflect that management.

All forest practices are regulated by the Washington Forest Practices Act. The rules and regulations recently received federal recognition in a Habitat Conservation Plan (HCP) for compliance with the Endangered Species Act. The rules require significant buffers on all fish streams and non-fish perennial streams. Roads must be maintained to meet Clean Water Act requirements, including control of sedimentation and provision for fish passage at all stream crossings. Forest Practices Act rules require landowners to upgrade all roads to current rule standards by 2016, or sooner if the road is used for hauling of forest products. These rules and timelines will likely result in better maintenance by Merrill & Ring than by the ONP, given ONP's current maintenance backlog. In addition to standard forest practice rules, Merrill & Ring is participating in the recovery planning process for the Lake Ozette Sockeye salmon. This process has identified limiting factors for the species and is currently developing recommended recovery plan objectives. The recovery plan, in conjunction with the Forest Practices Rules and its Habitat Conservation Plan will protect Lake Ozette Sockeye.

On page 36 (first paragraph) the DGMP states that “Recurring timber harvesting adjacent to these areas could result in highly visible clear-cuts, wind throw ..., the loss of important wildlife habitat..., and increase sedimentation...” However, the DGMP provides no documentation that any of these potential effects have actually occurred, even though the subject lands have been actively managed for many decades. Current forest practices rules require maintenance of critical wildlife habitats and stream protection. Portions of harvest units may be visible but are buffered by the existing park lands that surround the lake.

The DGMP proposes that the Washington Department of Natural Resources (DNR) will acquire a large forest block from the current private landowners. These lands will then be designated a “Legacy Forest”. The ONP doesn’t have the authority to specify what type of management DNR may utilize on its lands. The DNR is obligated, by the state constitution, to manage to benefit the trusts. This has been narrowly interpreted by the courts to include full fiduciary responsibility, not preservation.

Page 48 – Low Income/Poverty Populations

The third bullet states incorrectly that minority or low-income communities would not be affected. On our lands and much other private timberland leases are granted to harvest ferns and boughs. This work is done almost entirely by minority and/or immigrant residents. If the Lake Ozette boundary adjustment occurs, harvest in these bough-producing areas will cease, putting many low-income workers out of a job.

Page 64 – Table 2

The last line of the table indicating costs of boundary adjustments grossly underestimates the cost of acquiring land. Recent transactions of large blocks of timberland, i.e. the former Crown Pacific/Cascade Timberlands property in northwest Clallam County indicate prices of \$2500 per acre or higher. Sales of smaller tracts usually achieve higher values. Lands with significant amounts of mature timber will also be more costly. The purchase of around 60,000 acres indicated in Alternative D will likely cost at least \$150,000,000, over five times the DGMP estimate. The other alternatives will be similarly affected.

Page 86 – Table 3

The NEPA Section 101(b) Goals indicate in E “Achieve a balance between population and resource use that will permit high standards of living...” The DGMP fails to address the loss of jobs and displacement of workers that will occur if park expansion plans are fulfilled.

Goal F states “Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.” The DGMP fails to address the removal of up to 60,000 acres of commercial timberland that produce renewable products. Reductions in wood supply raise prices, causing mill closures and greater reliance on alternative products, nearly all of which are non-renewable and depletable.

Page 320 – Fish and Wildlife

The first paragraph discusses beneficial impacts to fisheries from park expansion into the Lake Crescent and Lake Ozette areas. However, the DGMP does not acknowledge the current Washington Forest Practices Rules and Regulations, the recently approved Habitat Conservation Plan for all aquatic species, or the requirement that forest landowners complete road maintenance plans by 2016. All of these will result in improvements to fish and wildlife habitats and to water quality. The ONP has no obligation to complete its backlog of maintenance projects, and current funding falls far short of meeting even current needs. It is probable that park expansion could result in adverse impacts to fish habitat and water quality.

Page 320 – Cumulative Effects

The fifth paragraph states, without any detail or corroborating evidence, that “Adverse impacts on wildlife are occurring in the Olympic region as a result of logging... Changes outside the park from these activities continue to adversely affect terrestrial and freshwater habitats in the park...” As noted above, the DGMP completely fails to acknowledge or address the Forest Practices Rules, HCP, DNR HCP, and other actions timberland owners take to improve habitat and manage for wildlife. With any action there are effects that may benefit one species or ecotype while damaging others, and where some others have little or no impact. The DGMP needs to avoid making broad generalizations about adverse effects and identify which species may benefit and which species may suffer from a particular action.

Page 320 – Conclusion

The park expansion proposed in the Preferred Alternative D will not have long-term benefits to wildlife and fish, compared to continued ownership and management for commercial timberland. There could be both short and long-term adverse impacts to fish habitat and water quality resulting from lack of proper maintenance if the current budget shortfalls continue.

Page 321 – Special Status Species

Paragraph five indicates that implementation of alternative D “would result in long-term moderate beneficial impacts on special status fish, including the Lake Ozette sockeye, and critical habitat in these watersheds.” There is nothing to back this claim. The DGMP must acknowledge the impact of the Forest Practices Rules, HCP, the current Recovery Plan process, and the ONP’s own failure to adequately maintain the facilities and roads it currently owns.

Page 322 - Cumulative Effects

The fourth paragraph is not true, especially given the new Forest Practices Rules and the HCP. Contrary to the last sentence stating “Habitat in the park could become some of the only remaining quality habitat on the peninsula”, many area rivers, including especially the Pysht River, have benefited from extensive habitat restoration projects and have salmon populations higher than any measured stream in Olympic National Park. Once again the DGMP draws broad generalizations that are judgmental, not backed by evidence, and in many cases false.

Page 323 – Impacts on Wilderness Areas

In the second paragraph the DGMP states “boundary expansion could aid in protecting wilderness characteristics. If areas within boundary adjustments are determined to be suitable for wilderness, wilderness opportunities in the park would increase.” The proposed expansion areas at Lake Ozette and Lake Crescent have experienced forest management activities for decades, including road construction, harvesting, planting, thinning and brush control. They are not suitable wilderness. The DGMP needs to be specific about what lands are considered to be of wilderness quality.

Page 339 – Ozette, Access

The DGMP states “a modest boundary change would be proposed to provide public access along the eastern shoreline of Ozette Lake.” The existing roads provide access to lands being considered for park expansion and additional timberlands beyond the proposed boundary. How will park visitor use be managed alongside industrial forestry use? Improvements of the current roads, or alternatively, construction of new roads, will have some adverse impacts on the lands the DGMP proposes to protect. Roads that currently serve industrial forestry operations must not be modified in any way that adversely affects the forestry operations.

Page 348 – Impacts on the Socioeconomic Environment – Conclusion

The DGMP completely fails to address the adverse impact on family-wage jobs resulting from park expansion removing commercial timberland from the region. The 60,000 acres (including both park expansion and “Legacy Forest”) could produce approximately 60 million board feet of logs per year, sustainable forever. This volume is around one years supply for any of the modern mill facilities on the north Olympic Peninsula. How many direct jobs will be lost (loggers, truck drivers, tree planters and thinners, mill workers, mechanics, foresters) if the park expansion proceeds? Which mills will be required to curtail operations due to lack of supply, and how will that affect their viability? The DGMP has addressed only the positive impacts of additional park employees, at the expense of the taxpayer, without considering the adverse impacts to the businesses that generate jobs that produce those taxes.

Private timberlands pay annual property taxes to the County, along with harvest excise taxes when trees are harvested. Timber sales from DNR lands are also taxed, at the benefit of the County. If park expansion plans proceed, removing 60,000 acres from currently managed commercial timberland, how will those tax revenues to the County be replaced? If they are not replaced, what will be the impact on the County and the services it provides to citizens?

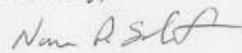
Conclusion

Merrill & Ring opposes all of the alternative park expansions described in the DGMP. We are not interested in selling our lands or seeing them included within an expanded boundary. The DGMP has failed to acknowledge the benefits to fish and wildlife habitat and to water quality resulting from current Forest Practices Rules and the HCP. The document also fails to recognize the adverse impacts of park expansion on the

socioeconomic environment, including losses of family-wage jobs. The DGMP makes numerous broad, unfounded and undocumented generalizations about benefits to fish and wildlife, without recognizing adverse impacts resulting from inadequate park maintenance.

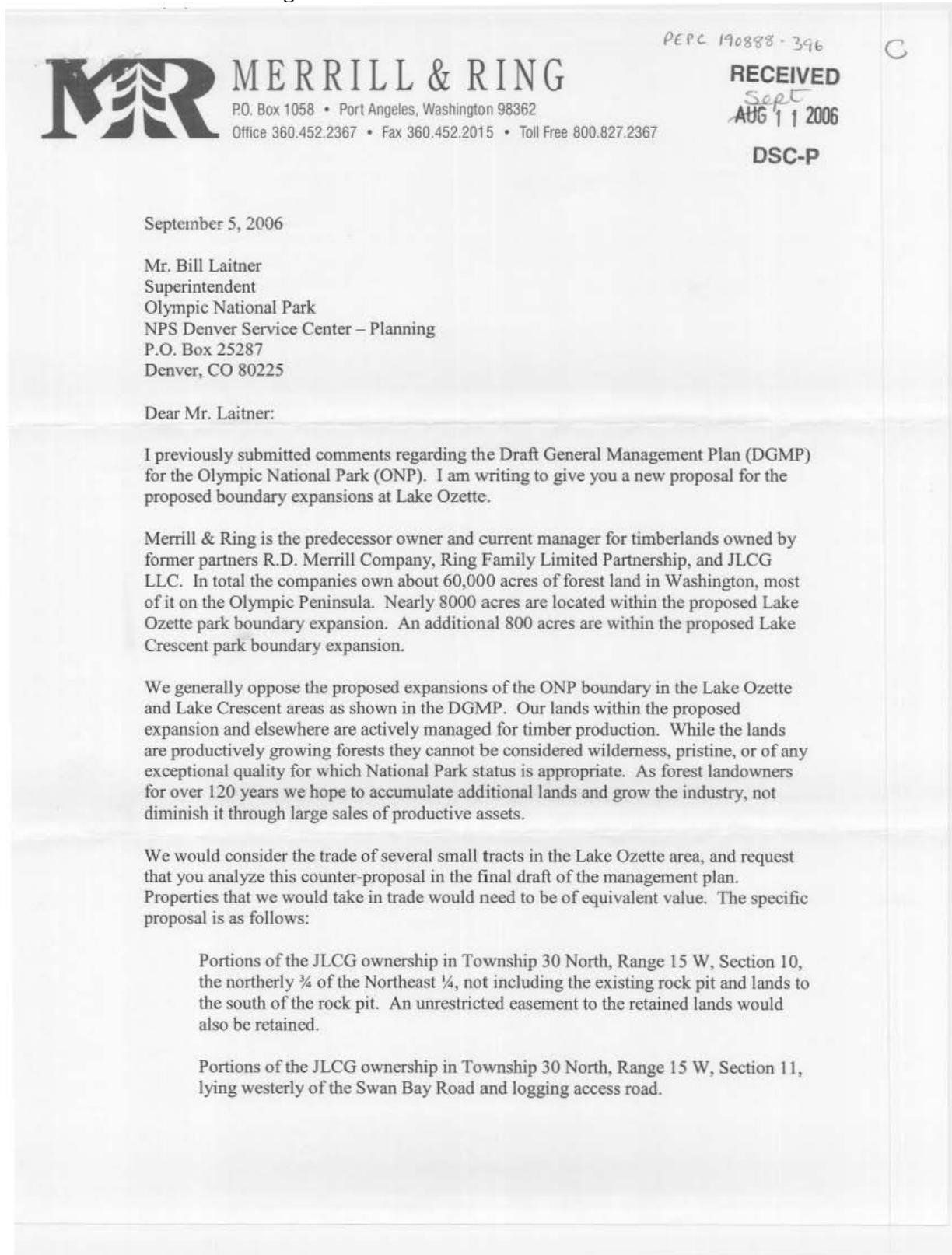
Thank you for the opportunity to review and comment on the Draft General Management Plan for the Olympic National Park. Please feel free to contact me if you have questions about any of these comments.

Sincerely,



Norm P. Schaaf
V.P./Timberlands & Administration

Comment 396–Merrill & Ring

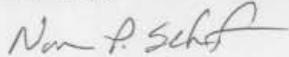


Portions of the R.D. Merrill Company ownership in Township 30 North, Range 15 W, Section 14, the North $\frac{1}{2}$ of the Northwest $\frac{1}{4}$ lying westerly of the logging road.

In addition to this proposal, please present more clearly in the Draft General Management Plan the numbers of acres proposed for boundary expansion and Legacy Forest in each of the alternatives and regions. The data as it is currently presented is vague, confusing and potentially misleading.

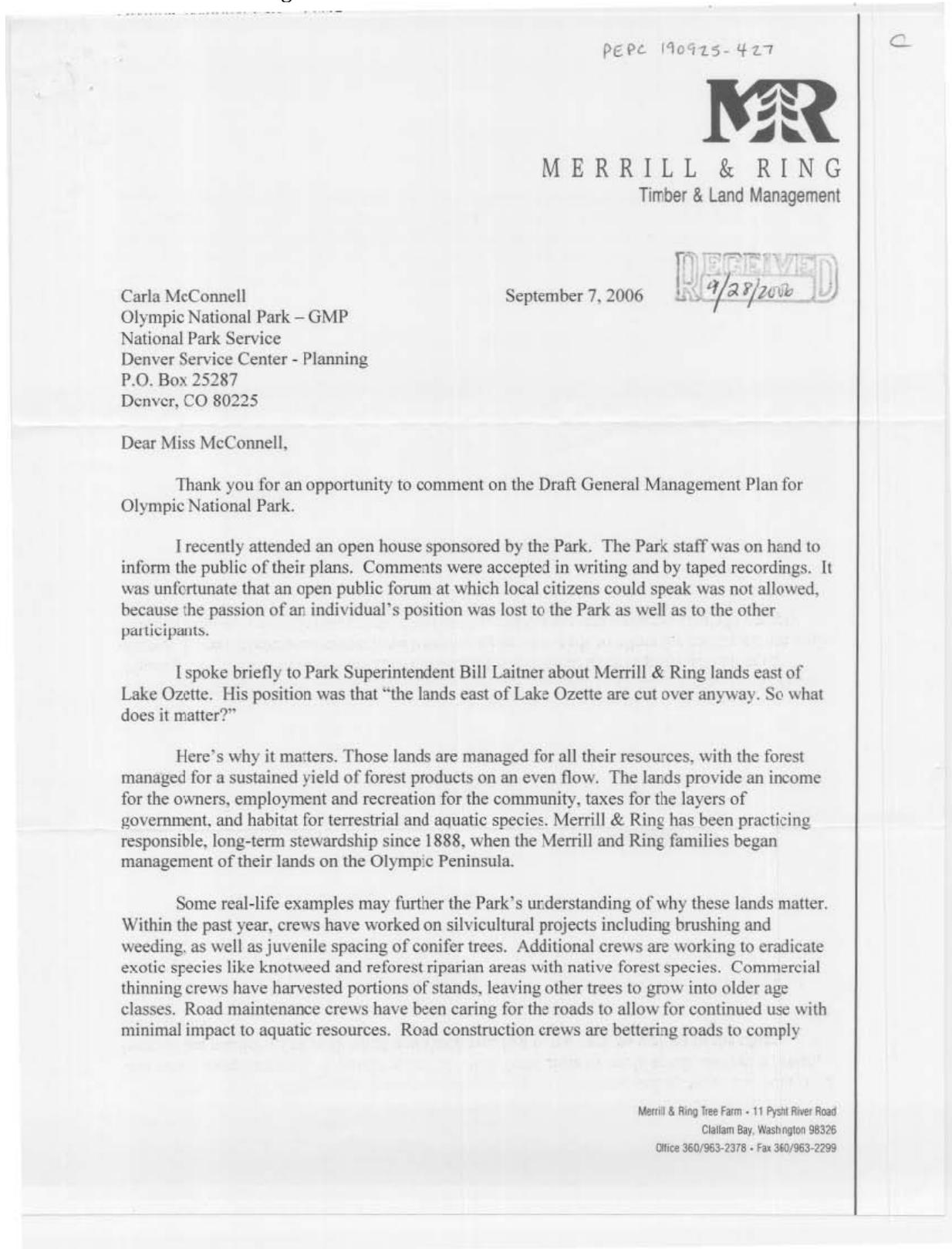
Thank you for the opportunity to review and comment on the Draft General Management Plan for the Olympic National Park. Please feel free to contact me if you have questions about any of these comments or wish to discuss this proposal.

Sincerely,



Norm P. Schaaf
V.P./Timberlands & Administration

Comment 427-Merrill & Ring

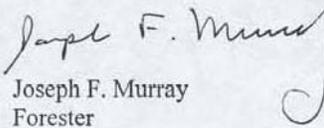


with the new Road Maintenance and Abandonment standards established by Forest Practices regulations. The supplemental bear feeding program employs people who feed the bears in the spring to reduce damage to the forest. All of this work is monitored by foresters and biologists who plan and lay out the various activities, while surveying the streams and forest to insure protection of fish and terrestrial habitat. In addition, there are crews who cultivate and harvest minor forest products.

Merrill & Ring has worked for years with other landowners, tribes, all layers of government and local citizens to develop and implement a recovery plan for the Lake Ozette Sockeye while trying to maintain a viable economic base for the community.

Perhaps these comments will inspire the Park to reassess their beliefs about the commercial forest and develop an understanding of forests where people live and work. The Park provides numerous public presentations, solicits written and taped comments, and goes to great lengths to include this input in publications to document the public process. It is unclear; however, to what extent this solicited input influences Park policies. I would recommend that the Park take a less imperial approach and talk with the people, not at them. We will share with the Park the names and contact information of some of the families whose livelihood will be taken away if the lands east of Lake Ozette are removed from the commercial forest land base. Olympic National Park should develop a plan around 'Alternative A' which allows for the maintenance of existing park lands, roads and developed areas.

Sincerely,


Joseph F. Murray
Forester

Comment 529-Portac, Inc.



PORTAC, INC.

BEAVER DIVISION
A subsidiary of MITSUI and Co. (U.S.A.), Inc.
Highway 101, MP 211
P.O. Box 38
Beaver, WA 98305

PEPC 191159-529

RECEIVED

OCT - 4 2006

DSC-P

Carla Mc Connell
Olympic National Park - GMP
National Park Service
Denver Service Center - Planning
P.O. Box 25287
Denver, CO. 80225

September 25th, 2006

RE: Olympic National Park Expansion

To whom it may concern,

I believe none of alternatives should be considered until all the facts for each alternative are presented to the public for comment. Some of the facts that have not been presented to the public are:

1. How much lost tax revenue there will be both to Washington State Department of Revenue for harvest tax and the counties involved due to personal property and payroll taxes due to unemployment. If any of these taxes are reimbursed by the Federal Government there should be an explanation of the exact procedure.
2. No mention of job loss nor payroll revenue loss due to lost harvestable ground base.
3. Why wasn't the Washington State Forest and Fish Law used in the EIS analysis.
4. If Lake Ozette is put into wilderness designation there would be could be no feasible active management to resolve the trash fish conflicting with the Sockeye Salmon.
5. If the boundaries are adjusted prior to acquiring the private land within, it would put an additional hardship on the landowners. The landowners would have to go through a Class V Special Forest Practice Permit to harvest their timber. If the U.S. Park Service never acquires the land this permitting process could last forever.

Until the above facts are presented to the public for comment the Park Service should not proceed with any of the land acquisition alternatives other than alternative A.

The values presented by the Park Service for acquisition and maintenance are not realistic. These costs should be gathered by a disinterested third party.

Currently, the U.S. Park Service does not have enough revenue to maintain the land they are charged with managing, how do they expect to manage a larger land base.

Sincerely,

A handwritten signature in black ink, appearing to read "Russ Westmark". The signature is written in a cursive style with a large initial "R".

Russ Westmark
Log Buyer

Comment 562-Rayonier



Ms. Carla McConnell
September 27, 2006
Page 2 of 4

- **Park control of the expansion area will not enhance aquatic resources when compared to continued private commercial timber management and could have adverse consequences.** The stated reason for expanding the Park boundaries in the Lake Ozette and Queets area is the unfounded assumption that commercial timber harvest will put the fisheries in Lake Ozette and the Queets River at risk, while park management will preserve the fisheries (Plan at 208, 320-21, 370, maps M24, M40). That assumption may once have been true, but has not been true since at least the 2001 adoption of Washington's "Forest and Fish" forest practices rules. See, WAC Chapter 222. The drafters of the Plan and EIS appear to have been completely unaware of the collaborative "Forest and Fish" process between the U.S. Environmental Protection Agency, the National Marine Fisheries Service, the U.S. Fish & Wildlife Service, the Washington Department of Ecology, the Washington Forest Practices Board, affected tribes, and the forest industry. They appear to be unaware of EPA's written assurances that compliance with the Forest and Fish rules will lead to compliance with the Clean Water Act, and the U.S. Fish & Wildlife Service's and NMFS' issuance of incidental take permits under the Endangered Species Act covering forest practices that comply with the Forest & Fish rules. All three agencies have concluded that compliance with the Forest & Fish rules will be protective of threatened or endangered aquatic species and lead to compliance with the Clean Water Act.¹ In light of those facts, it is untenable today to simply assume that Park ownership of the property or taking it out of commercial forestry will provide better protection of the riparian resources than continued commercial forestry.

To the contrary, the lands in question require investment in order to avoid adverse aquatic impacts. The Forest & Fish rules require all major landowners to develop and implement a Road Maintenance and Abandonment Plan (RMAP) for all roads within their ownership. WAC 222-24-050, -052. Rayonier has done so. The Rayonier property within the proposed boundary expansion area contains 46 miles of roads, and the Rayonier property within the exchange area contains 72 miles of roads. If the property remains under Rayonier's commercial management, Rayonier will be responsible for bringing those roads up to current standards for aquatic protection and regularly maintaining them. If they are within the Park, correcting problems with the roads and maintaining them will be the Park's responsibility. Unless the Park can be assured that Congress will appropriate funds to manage these lands on a long-term basis, it may well be the case that taking them out of active commercial management and putting them in

¹ They say "lead to compliance" because in areas which currently fail to comply with water quality standards because of temperature, compliance may not occur until the riparian forests have grown large enough to provide adequate shade. That will in some instances obviously take some years to occur. But, the trees will not grow faster if within the boundaries of the Park or withdrawn from commercial timber management. Indeed, the Forest & Fish rules permit certain kinds of riparian harvest to replace less desirable deciduous forests with softwood forests and thereby enhance riparian function and accelerate Clean Water Act compliance. Presumably little or none of that riparian restoration will occur if the lands are within the Park boundaries.

Ms. Carla McConnell
September 27, 2006
Page 3 of 4

the hands of an entity with too many priorities and not enough resources will result in less protection for aquatic resources, not more.

The Plan also assumes that timber harvesting would risk sedimentation, which would be harmful for aquatic resources. (Plan at 370) Prior to the Forest & Fish Rules there may have been instances in which logging contributed excess sediment to streams, thereby damaging aquatic resources. But, the Forest & Fish rules radically increased the size of riparian management zones, WAC 222-30-021, included protection for forested wetlands and their buffers, WAC 222-30-020(7), took steps to maintain stream bank integrity, WAC 222-30-030, created additional limitations on yarding methods, WAC 222-30-050, -060 and -070, and required expert review of harvests on potentially unstable landforms, WAC 222-16-050(1)(d). The combination of those restrictions should reduce the sediment delivery to streams to close to, if not background levels.

Finally, it is important to note that the Forest & Fish rules include a rigorous adaptive management process, in which the rules will be amended as research determines amendments are necessary or appropriate. WAC 222-12-045. Research is proceeding under CMER at this time to better answer questions for which there was not a scientific answer at the time the Forest & Fish rules were adopted. The federal resource agencies (the EPA, NMFS and the US Fish & Wildlife Service) have regular input into the adaptive management process through TFW. Thus it can be assumed that if research determines that the current rules are inadequate for aquatic resource protection, they will be amended accordingly in the future.

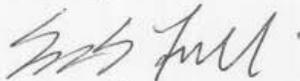
- **Taking 60,000 acres of commercial timberland out of production on the Olympic peninsula will have significant adverse socioeconomic impacts.** The Plan completely ignores the adverse socioeconomic impacts of taking 60,000 acres of land out of commercial timber production on the Olympic peninsula. The Plan and EIS documents the fact that personal income of residents on the Olympic peninsula lags behind that of the rest of Washington State. (Plan at 166) It also documents the region's heavy dependence upon services, government and retail jobs. (Plan at 167). As harvests have been restricted for environmental and aesthetic reasons, communities in once timber-reliant areas have faced a continuing loss of family-wage manufacturing jobs, to be replaced, if at all, by low-wage service and retail jobs. The average wage in the forest industry on the Olympic peninsula is roughly \$30,000 – significantly higher than the average for the region. Taking 60,000 acres of commercial timber land out of production will cost not only the jobs of the people required to manage, plant, thin and harvest that land, but also the mill workers who would have processed those trees into finished lumber. Although other aspects of the Plan may result in additional service and retail jobs being created on the peninsula, there will be no jobs created by expanding the Park boundaries to compensate for the loss of family-wage jobs in the forest products industry. The EIS must recognize that significant adverse impact on the wage base of the Olympic peninsula.

Ms. Carla McConnell
September 27, 2006
Page 4 of 4

We want to close with a recommendation for another alternative that is based on fairness. While Rayonier disagrees that taking 60,000 acres of managed commercial forest land out of production and putting it into the Park or a "legacy forest" status will provide any significant environmental benefits, it also understands the political attraction of expanding a National Park. We understand that there are interest groups who view park expansion as an end in itself. Rayonier recognizes that if the plan to expand the Park is not based on science, it may well nonetheless meet approval in the court of public opinion. If Congress decides to expand the Park and appropriates the money to do so, then the Park will be expanded. What would be untenable, however, is to attempt to achieve the goal of taking the land out of commercial production without Congress appropriating the money to acquire the rights it wants for the land's fair market value. Current forest practice rules make commercial management of lands within the boundaries of a national park economically unfeasible. WAC 222-16-050(1)(c). Thus no expansion of the boundaries should occur unless and until the Park Service consults with individual landowners to identify areas of ecological significance worthy of inclusion in the National Park, and Congress appropriates the money to acquire the land for just compensation. No additional constraints should be placed on the land in the park expansion area. Rayonier, like all commercial forest companies in the Northwest, has been asked over the last twenty years to restrict its harvest and the productivity of its land to meet a variety of environmental concerns. But, if the land is wanted for a park, then that is a public use. Land can always be taken for a public use, but when it is, just compensation is required.

Thank you for considering these comments. We would be happy to provide further information as to any of the issues we have discussed.

Sincerely,



Eric Fanelli
Director, Pacific Forest Resources

cc: The Honorable Norm Dicks
The Honorable Patty Murray
The Honorable Maria Cantwell
The Honorable Senator James Hargrove
The Honorable Representative Jim Buck
The Honorable Representative Lynn Kessler

Comment 440–Rochelle Environmental Forestry Consulting

PEPC 190938-440

Rochelle Environmental Forestry Consulting
3127 Hollywood Drive NE
Olympia, WA 98516-1400

September 23, 2006

National Park Service:

I appreciate the opportunity to comment on the Draft General Management plan and Environmental Impact Statement for Olympic National Park. My comments focus on Alternative D, Olympic National Park's (ONP) preferred alternative, specifically with regard to its proposed actions for expansion of the Ozette and Lake Crescent portions of the Park. These comments were prepared at the request of Green Crow Timber, LLC of Port Angeles, WA, which owns approximately 1,500 acres of forestland in the area of proposed park expansion at Ozette and another 500 acres within the proposed Lake Crescent expansion area. . Also, in the Ozette watershed, Green Crow owns approximately 5,000 acres and manages, for institutional investors, an additional 11,000 acres within the 44,000 acres proposed for purchase and exchange with the State of Washington School Trusts administered by the WA Department of Natural Resources.

The major concern of these private forest land owners and investors is the expansion of the park to include private managed forest lands, ostensibly for the protection of the threatened Lake Ozette Sockeye salmon and its critical habitat, the watershed and water quality of the lake, and the view shed. Also, in the Lake Crescent area, the GMP suggests the proposed expansion near the lake outlet at the head of the Lyre River is necessary to protect the spawning areas for Beardslee and Crecenti trout.

Concerns expressed here regarding alternative D apply to alternatives B and C as well, as they propose expansions encompassing even greater acreages of private forestland.

Under Alternative D, park boundary adjustments in the Ozette unit include expansion to include 12,000 acres of private forest land within the park boundary and the acquisition of an additional 44,000 acres of private forest land outside the park boundary but within the Ozette watershed to exchange for the mineral rights owned by the Washington Department of Natural Resources within the boundaries of ONP. The proposed boundary expansion at Lake Crescent will include an additional 1640 acres of private forestland.

ONP's proposal states that private forest lands within the expanded boundaries would be managed under cooperative private/public land conservancy strategies to protect fisheries habitat, water quality and the view sheds and that private land acquired for exchange with DNR would be purchased from willing sellers.

Arguments against park expansion to encompass additional area in the Ozette watershed.

In my view, park expansion for the protection of the threatened Lake Ozette Sockeye salmon and its critical habitat, the watershed and water quality of the lake, and the view shed is not warranted, and in fact will be less effective in achieving these objectives than several programs currently in place. The expansion proposal fails to acknowledge the existence of these initiatives, which include the Washington Forest and Fish Regulations (FFR) which are supported by a Federally-approved Habitat Conservation Plan, and the Lake Ozette Sockeye Salmon Recovery Planning process (LOSRP) being administered by NOAA Fisheries. These initiatives, discussed further below, currently provide both aquatic resource protection (FFR) and will identify and implement restoration and enhancement activities targeted at the factors considered to be limiting Sockeye salmon populations (LOSRP). Both of these initiatives include active processes, in comparison to ONP's proposals which are passive, and as a result will lead to more rapid, focused improvements in habitat conditions for fish and wildlife.

Since these initiatives have not been considered, or even acknowledged in the GMP, the requirement, under park policy, that an expansion of park boundaries requires a determination that other alternatives for management and resource protection have been considered and are not adequate (Appendix B, p.369 ONP-GMP), has not been met.

The Forest and Fish Regulations

This set of regulations, focused largely on environmental protection, was developed cooperatively by state and federal agencies, industrial and small-private landowners, and tribes, and sets the rules for conduct of forest practices on state and private forest lands in Washington State. The objectives of the FFR, as defined by the WA State Forest Practice Board, which is made up of a range of stakeholders with key interests in resource management on state and private forestlands, are to:

- Provide compliance with the Endangered Species act for aquatic and riparian-dependent species.
- Restore and maintain riparian habitat to support a harvestable supply of fish
- Meet the requirements of the Federal Clean Water Act for water quality.
- Keep the timber industry economically viable in the state of Washington

Key elements of FFR, which ensure that forest management activities protect aquatic resources, and lead to improved aquatic habitat conditions, include:

- Expanded stream protection rules
- Protection of unstable slopes
- Road maintenance and abandonment planning focused on achieving fish passage and water quality improvements.
- An adaptive management element which will direct changes to the regulations if research and monitoring indicates that the new standards are not being achieved.

Additionally FFR addresses view-shed concerns through its limitations on harvest unit size and requirements for green-up prior to harvest of adjacent units. FFR also contains provisions for voluntary modification of management practices in areas of high public exposure and aesthetic sensitivity.

The regulations are supported by the State of Washington's Habitat Conservation Plan (National Marine Fisheries Service, U.S. Fish and Wildlife Service, 2006), which covers 70 species of native fish and amphibians, and applies to 9.3 million acres of state and private forestland and more than 60,000 miles of streams. The HCP states that Washington State Forest Practice Rules are strong enough to protect fish habitat and water quality in accordance with strict Endangered Species Act (ESA) requirements.

Lake Ozette Sockeye Salmon Recovery plan

This plan, scheduled for completion in December 2006, is based on a Limiting Factor Analysis (LFA) that identifies and prioritizes factors limiting population recovery (Haggerty 2006). The LFA has hypothesized, but not quantitatively demonstrated, cause and effect relationships between forest management activities and sockeye population declines. In fact, Sockeye and other salmonid populations crashed before substantial timber harvest occurred in the Lake Ozette watershed (Dlugokenski et al. 1981, Jacobs et al. 1996). These hypothesized relationships of forest management to Sockeye declines and lack of population recovery are largely based on past logging and road construction practices which preceded the adoption and continual strengthening of forest practice rules over the past several decades, the latest being the Forest and Fish Regulations and HCP discussed above. Nevertheless, the recovery plan currently under development will address those hypotheses by identifying actions to address concerns regarding detrimental effects of logging and road construction on sockeye habitat and implement restoration or enhancement projects where a specific need is identified.

The LFA identified a number of additional factors as limiting Sockeye recovery in Lake Ozette. Among these are predation on adult and juvenile fish both within the lake and in the Ozette River, lake level changes caused by early settler clearing LWD for navigation on the Ozette River, poor spawning habitat conditions within the lake caused by the lake level changes, and low populations levels resulting from historic over fishing. The likelihood that these factors are of greater importance than forest management in limiting sockeye recovery is supported by observations of the status of fish populations in adjacent watersheds with similar physiographic conditions and logging and road construction histories. An example is the Lake Pleasant Sockeye Population, for which threatened species listing was not considered to be warranted at the time Ozette sockeye were listed. This beach-spawning population is considered to be relatively healthy and stable, or possibly increasing (Personal communication; Chris Northcutt, Quileute Tribe, July 2006). Coho salmon production in streams in the watershed of Lake Pleasant is also high and increasing. Over 85% of the watershed is in state and private ownership and has

many similarities to Ozette with regard to geology and logging history. (WA DNR, Sol Duc Watershed Assessment 1994)

Similarly, the Dickey watershed, a Quillayute river tributary largely in private ownership and managed for forest products, has supported healthy Coho salmon populations on a continuing basis (WA DNR watershed assessment 1998). Significant spawning densities of Coho salmon occur in almost all tributaries of the Dickey, which has similar soils and geology and a logging history comparable to that of the Ozette Basin. This river system was rated healthy by the Washington Department of Fish and Wildlife and considered one of the most productive for Coho salmon in the state (WDFW 1992).

The relatively good condition of the Lake Pleasant sockeye and Dickey River populations, in spite of similar logging practices to the Ozette watershed supports the Ozette LFA conclusion that multiple limiting factors are operating and further suggests the relative importance of forest management as a limiting factor may be overstated.

Future conditions in the Ozette basin: Although documentation is not in place to support the contention that forest management is a limiting factor for Lake Ozette Sockeye, several factors are operating to ensure conditions are on an improving trend, making restriction of management activities, as proposed by ONP, unnecessary. As a result of the logging history, most of the roads needed for future management are already in place, significantly reducing the level of future road construction. Logging activity is at a moderate level and will continue to be into the future both as a result of stand age and harvest unit size regulations. Road maintenance planning and upgrading are taking place in the basin, with a focus on water quality and fish habitat improvements. The recent upgrade of Washington Forest Practice rules as a result of FFR established expanded riparian protection requirements as well as restrictions on all operations near water; requirements judged sufficient to meet ESA requirements for protection of fish habitat and water quality. Implementation of the LOSRP is expected to eliminate or reduce the influence of other factors, such as predation and effects of coarse woody debris removal, that are judged to be limiting the Sockeye population. LOSRP implementation is also expected to result in substantial habitat enhancements necessary to quickly reach the goal of harvestable numbers of fish. Since both FFR and LOSRP involve directed, active efforts, they can be expected to support more rapid recovery of this depressed ESU than the passive approach that would occur under ONP jurisdiction.

Arguments against the Lake Crescent park boundary expansion.

Available information suggests there is little justification for park expansion in the area of the Lyre River outlet of Lake Crescent. The GMP indicates the purpose of this expansion is for the protection of the spawning areas of the Beardslee rainbow and the Crescent cutthroat trout, both of which are resident in Lake Crescent except during the spawning period when they enter the Lyre River. The spawning area for Beardslee trout is limited to a 400-foot stretch of the Lyre River above the Lyre Bridge, just downstream of the lake outlet. The cutthroat spawning area extends approximately 1 mile downstream of the outlet to the mouth of Boundary Creek. (Goin, 2002).

As they have received little study, life history information for both of these fish stocks, which are endemic to Lake Crescent, is limited. Observations that do exist indicate that spawning counts of both Beardslee and Crescenti trout have declined in recent years. Goin (2002) lists several factors considered to be negatively affecting these fish stocks. These include a loss of spawning area, from logging on Piedmont Creek and from boating and human activity on the long channel in Lake Crescent above the outlet to the Lyre River. These activities apparently result in siltation of spawning gravels downstream of the lake outlet to the river. Goin (2002) also points out that several of the major spawning sites in the Lyre River are associated with logjams, which accumulate gravel, forming spawning areas. These logjams, which are deteriorating and becoming smaller with time, are considered vital for gravel retention and when they are lost, will result in the loss of most Lyre River trout according to Goin (2002). Conversely, Washington Trout, a citizen's group, considered harvesting of Beardslee trout by sport fishermen to be the major cause of their decline (WA Trout, undated). Habitat quality was not considered a problem since the Lake Crescent watershed lies almost entirely within the park, which provides protection from habitat degradation potentially associated with land use activities. In response to the urgings of Washington Trout, ONP has modified fishing regulations in Lake Crescent to protect Beardslee trout.

By virtue of their existence in a protected watershed, and the restricted areas downstream of the outlet of the lake where spawning occurs, it seems unlikely that land use activities, including logging, are threatening these trout stocks. It is not clear to what extent historic land use activities may have influenced habitat, but as outlined above relative to Lake Ozette, forest practices have become increasingly restrictive over the past several decades. The Forest and Fish Rules, discussed above in detail, are considered by federal and state agencies and tribes to be adequate for protection of fish habitat and water quality, and are the standard for forest practices carried out in the private land portions of the proposed expansion area. Of particular significance are the rule requirements associated with road management, with their emphasis on addressing road-related fish habitat and water quality concerns. An additional consideration is that inclusion of this area in ONP is likely to limit efforts to quickly address current problems, such as the loss of the gravel-retaining log jams discussed by Goin (2002). The responses of ONP would likely be passive, and less timely than the active, directed efforts that could occur under current ownership. For these reasons, and because the amount of forest land that could potentially influence the spawning areas is extremely limited, especially given the long period between management entries, park expansion to protect these fisheries from forestry-related habitat degradation is, in my opinion, unwarranted.

Other resources affected by the ONP proposal.

Roosevelt elk and black-tailed deer are wildlife species of high interest on the Olympic peninsula both for hunting and for viewing by the local public and visiting tourists. Populations of both of these species are highly influenced by the amount of forage available on a year-round basis (Cook et al 1998). While they occur at low levels within unmanaged forests such as parts of ONP, within the park they tend to be closely associated with natural openings including the alpine zone and areas of natural

disturbance such as riparian areas in the valley bottoms and areas of forest mortality from wind throw and disease. Highest populations occur outside the park, however, where larger-scale disturbances associated with timber harvest have created abundant supplies of forage. The shifting mosaic of interspersed foraging and hiding cover areas resulting from timber harvest create ideal conditions on a continuing basis for these species. The absence of timber harvesting, which is expected under the ONP expansion proposal will result in a landscape dominated for many years by middle-aged forest stands, which, because of the limited amounts of available forage, is the least productive stage of forest development for deer and elk.

Summary:

I believe the proposed expansion of ONP in the Ozette basin and Crescent Lake portions of the park to include substantial acreages of private forest land is unlikely to achieve its stated objectives of habitat and water quality improvement. Compared to several active initiatives already in place, activities occurring with park expansion are likely to be passive, and improvements in critical habitat for Lake Ozette Sockeye, the watershed and water quality of the lake are not likely to occur in a timely manner, if at all. The Forest and Fish Regulations are currently implementing federally approved environmental measures designed to protect and improve fish habitat and water quality. Expanded riparian protection and road maintenance and abandonment plans are key activities within FFR directly focused on maintenance and improvement of aquatic resources. At the same time, implementation of the Lake Ozette Sockeye Recovery Plan will target the specific factors determined to be limiting the recovery of salmon, and address those factors through restoration and enhancement efforts. Addressing several of these factors such as predation on adult and juvenile Sockeye and lack of coarse wood in streams will require active directed efforts. Forestry practices, such as thinning in riparian zones can be used to accelerate the development of desired habitat conditions much more rapidly than a passive “let nature take its course” approach. Active efforts of this type are not likely to occur under Park management. Importantly, under the Cooperative Monitoring Evaluation and Research element of FFR, monitoring programs will be in place to assess effectiveness of forest practices as well as recovery plan implementation, and will provide guidance for improvements as needs are observed. Black-tailed deer and Roosevelt elk populations are additional resources of high public interest which benefit from the continuation of forest management in the Ozette area and which will likely decline under park management.

Thank you for the opportunity to comment on the draft General Management Plan and EIS for Olympic National Park. My literature references are listed below. Please feel free to contact me if you require clarification of any of my comments.

Very truly yours,

James A. Rochelle, Ph.D.

References:

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- Washington Department of Fisheries and Wildlife, and Western Washington Treaty Indian Tribes. 1993. Washington State salmon and steelhead stock inventory. Olympia, WA.
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- Washington Department of Natural Resources (DNR). 1998. Dickey River Watershed Analysis. Olympia, WA.
- Washington Trout (undated). Olympic National Park announces fishing rule changes in Lake Crescent. Online report at [http:// www.washingtontrout.org/crescent.shtml](http://www.washingtontrout.org/crescent.shtml).

Comment 426-Seacrest Land Development Corp.

Olympic National Park Draft General Management Plan

Summer 2006

National Park Service
U.S. Department of the Interior



190924-426

COMMENT SHEET ONP - GMP

RECEIVED
9/28/2006

We welcome your comments on this project. The comment period closes on **09/30/2006**. Your comments must be delivered or postmarked no later than **09/30/2006**.

You may complete this form and provide it to the NPS at one of the open houses, or you may send this form and/or your letter to:

National Park Service
Denver Service Center - Cliff Hawkes, DSC-P
12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225-9901

It is the practice of the NPS to make comments, including names, home addresses, home phone numbers, and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives of or officials of organizations or businesses, available for public inspection in their entirety

Personal Information

First Name: Morian Middle Initial W
Last Name: Dickinson
Organization: Seacrest Land Development Corp.
Address 1: 1828 O'Brien Rd.
Address 2:
City: Port Angeles State/Province WA
Postal Code: 98362
E-mail:

Keep my contact information private. Provide justification:

Please use below and the back of the paper for your comments. Attach extra sheets as necessary. Please print or write clearly.

I am responding to your draft Plan as it regards the Kalaloch area. As the former owner of Kalaloch Lodge, I am aware that Kalaloch Lodge must be moved in the near future, due to erosion problems undercutting the present structure.
(over)

The Seacrest Land Development Corp. would be glad to entertain the possibility of moving the lodge 3½ miles south on ocean front property in order to preserve this historic structure and its continual use, as well as allowing the Park to reduce commercial activity on National Park land, a long stated National Park objective.

Please contact me at: 1828 O'Brien Rd
Port Angeles, WA 98362 for more information

Sincerely,
M. W. Davidson
Seacrest Land Development Corp.
President

Comment 345-SnoIsle Natural Foods

PEPC 190622-345



"Steven Moore"
<s.w.moore@worldnet.att.net>

09/26/2006 08:36 AM
MST

To: <olym_gmp@nps.gov>
cc:
Subject: Olympic National Park Draft General Management Plan/Environmental

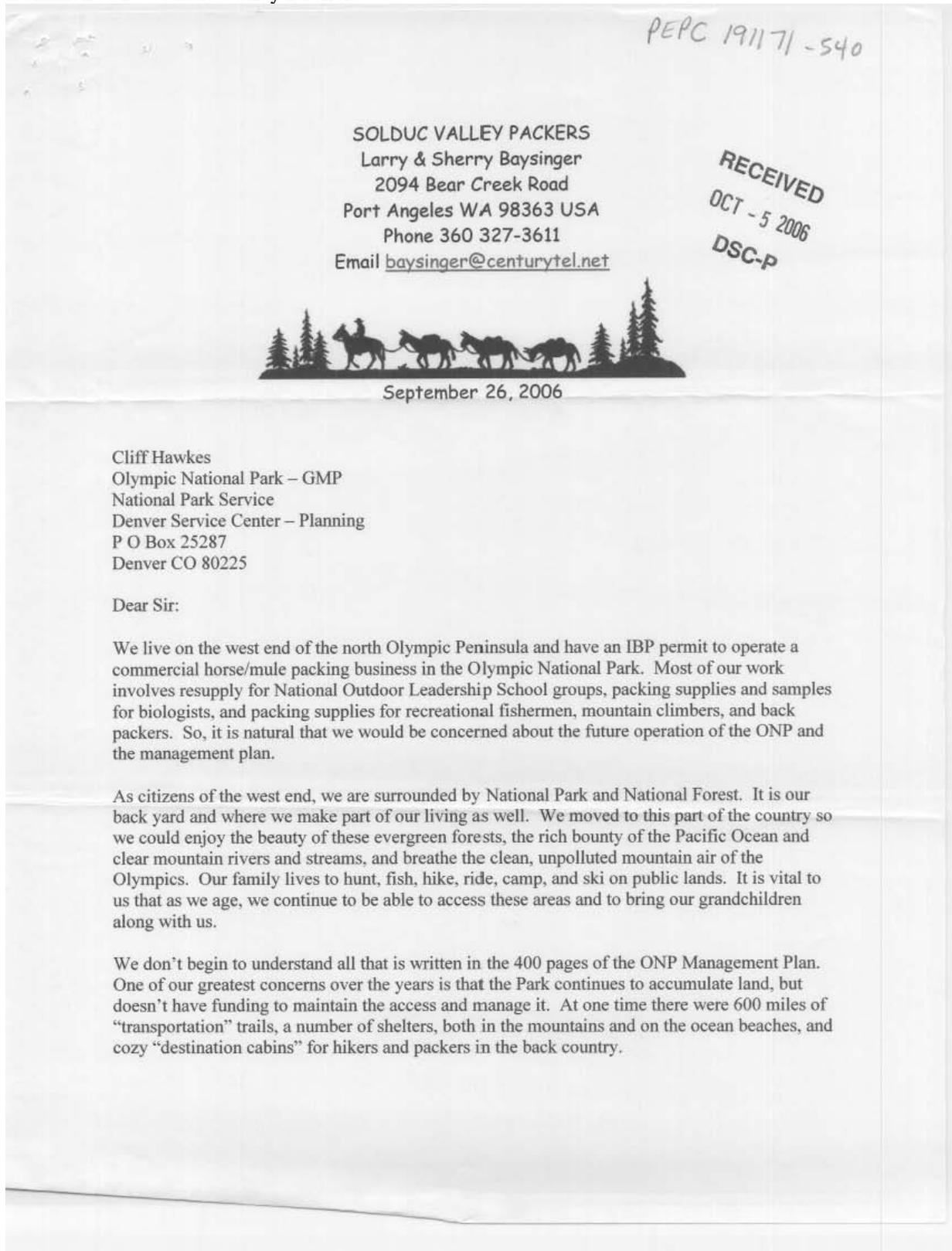
I am a long term park user. You can view my images from this years two week exploration of the coastline at <http://home.att.net/~s.w.moore>

The plan should focus on enhancing the environment of the park for the native species that make the area their home. Develop a unique Wild and Scenic River plan for each of the rivers in the park. Develop no new roads. Reduce the number of motorize vehicles and limit their access. Maintain the existing park infrastructure, but do not invest in new visitor facilities. Increase the funding for wilderness rangers and expand their presence in the park. Acquire as much land adjacent to the park as possible and begin the process of restoring them as natural habitat.

Your most important task is to preserve and enhance the natural environment of the park. So my kids, their kids, and the generations that follow can enjoy it's natural beauty.

Sincerely,
Steven W. Moore
Board President
SnoIsle Natural Foods
Everett, Wa.

Comment 540–Solduc Valley Packers



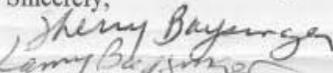
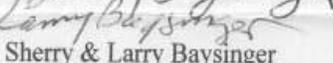
disrepair and only the wealthy and not many family people can afford to stay in the destination resorts that are left at Kalaloch, Quinalt and Lk Crescent Lodge.

Many of the trails cannot be kept open without the use of pack animals to carry the tools, chain saws, etc. Every year we donate hundreds of hours doing skilled labor with our stock maintaining and clearing trails in the National Park and National Forest. There are so few designated stock camps that we often travel 12-15 miles a day to reach a designated stock camp, often cutting our way through the windfalls as we go. We would like to see more designated stock camps in the back country; especially for those who are there to do work. We want the ONP Management plan to include the use of horses on all the trails where stock historically were used.

There are some who believe that only the young and fit have a right to be in the back country. Many of the clients we work for these days are people with disabilities; especially baby boomers (like us), who have been avid hikers/climbers and now have disabilities that keep them from carrying heavy packs. Our pack animals enable these people to achieve their dream of hiking into their beloved mountain camp in spite of their disabilities. We want to see future generations, whether fit, or disabled have this choice. If pack stock are not allowed in certain areas of the Park, if the trails are not kept maintained to stock standards many, many disabled Americans will have no access to the Park.

It is our sincere hope that ONP maintain the trails that have historically supported stock. We hope the new ONP plan will not change trail classifications as a way of permanently closing trails to stock in order to reduce trail infrastructure requirements to a lesser and more financially management level. We hope that the ONP management plan will not exclude businesses such as ours and National Outdoor Leadership School whose operation brings considerable revenue back into the Park.

Sincerely,



Sherry & Larry Baysinger

Comment 123–The May Valley Company

PEPC 189 431-123



"The May Valley
Company"
<kpj@mayvalley.com>
08/24/2006 06:59 PM
MST

To: <olym_gmp@nps.gov>
cc:
Subject: Olympic Park and stock use

Please keep the park open to stock use; we at Back Country Horsemen contribute thousand of hours of work on trails each year, both hiking and stock use.

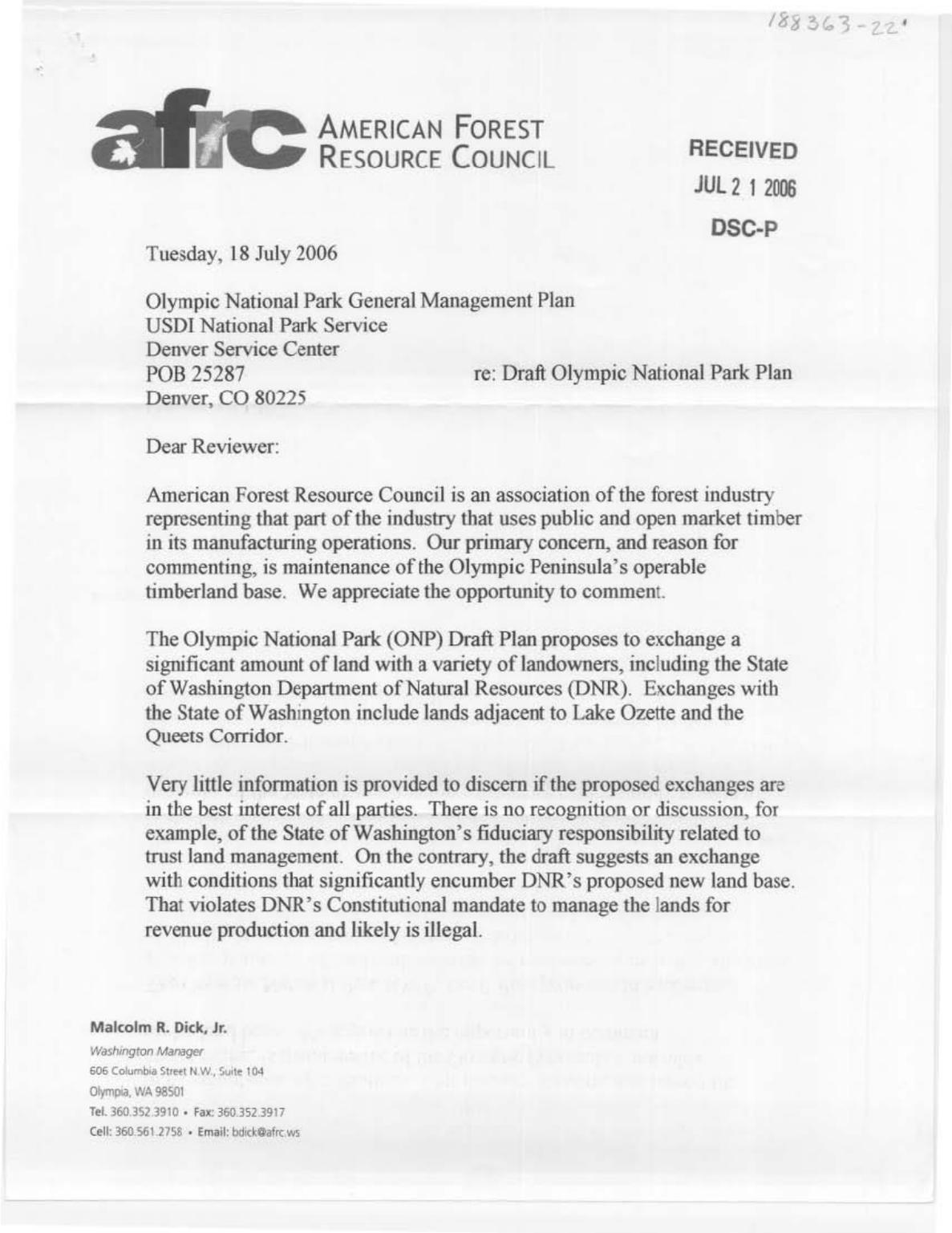
With Forest Service budgets being cut each year, Washington State needs to utilize the knowledge and expertise of our trails crews by keeping trails open.

Our stock can carry heavy materials like gravel for trails and timber for bridges into fragile areas with minimal damage. Maintained trails keep hikers from cutting new trails and damaging the surrounding areas.

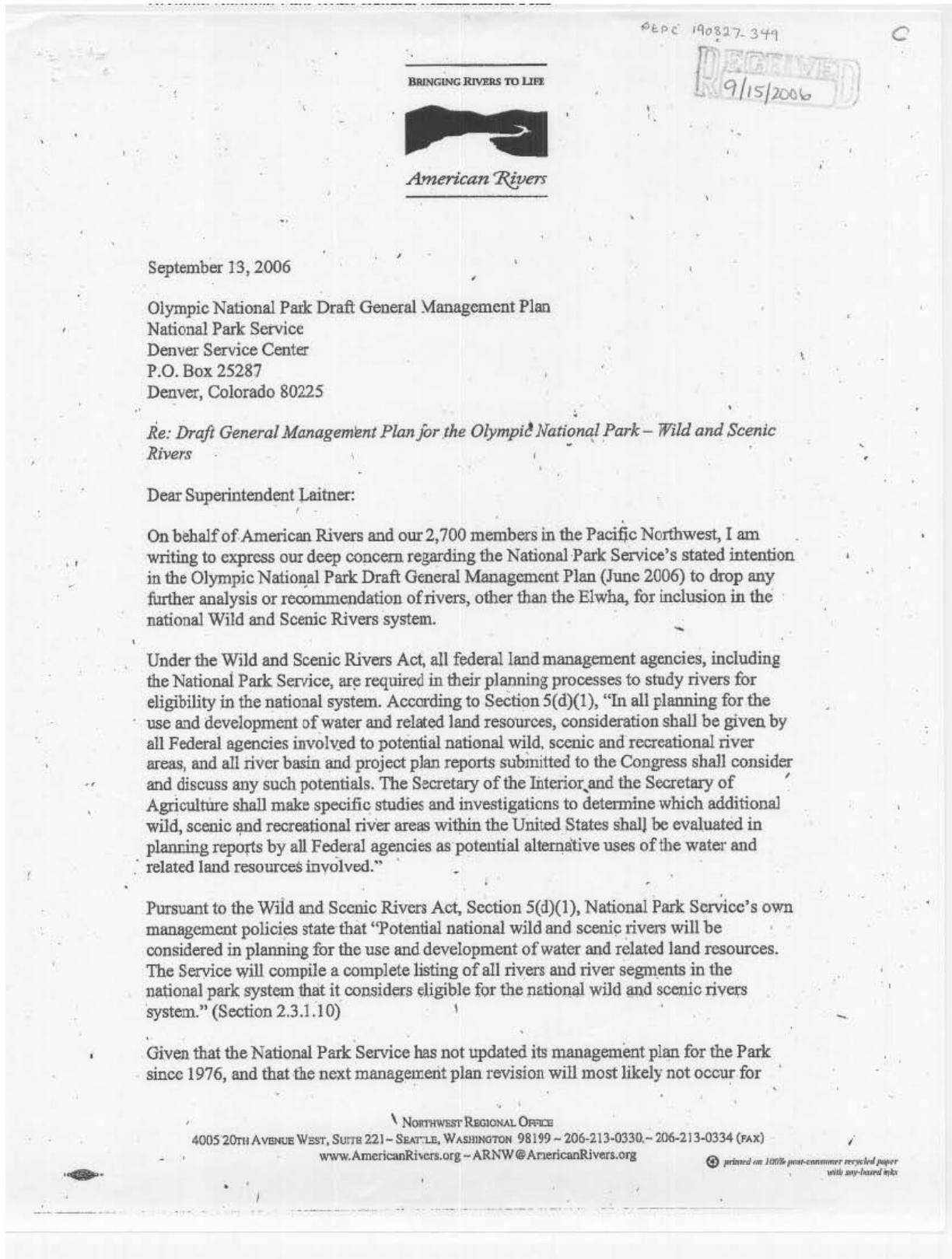
Please include a large number of trails open to stock use and we would very much would like a horse camp; I'm sure you would find the volunteers to build it! Thank you very much, Kathy Jones

Interested Parties

Comment 22–American Forest Resource Council



Comment 349–American Rivers



another 20 years, we believe it is particularly important to study and recommend rivers for their eligibility in the national Wild and Scenic Rivers system in this general management plan process. Many of Olympic's rivers are clearly of Wild and Scenic caliber, and they contain some of the best remaining habitat for wild salmon. The Park Service, in a preliminary analysis, has already determined that 13 rivers are eligible for inclusion in the Wild and Scenic Rivers system. As noted in the draft plan, "Most of the eligible portions of these rivers are in designated wilderness, and wild and scenic river designation would compliment this and afford additional protection."

Additionally, in its 1990 Olympic National Forest Land and Resource Management Plan, Final Environmental Impact Statement, the U.S. Forest Service has also determined many of these rivers to be eligible as a result of its own studies, including the Duckabush, Dosewallips, Gray Wolf, Elwha, Sol Duc, Bogachiel, Hoh, Quinault and South Fork Skokomish rivers. (Copies of the studies were sent to Nancy Hendricks on 09/05/06). However, since the major portion of some of these rivers lies within Olympic National Park, such as the Hoh, Quinault, Bogachiel and Elwha, the Forest Service has not performed any further analysis *and is deferring to the Park Service for any recommendation to Congress to include these rivers in the national Wild and Scenic Rivers system.* Also, the Forest Service notes in its 1990 plan that "the Queets (River), in all probability, meets the evaluation criteria for a Wild and Scenic River." However, since the Queets does not have a portion of its river corridor within the National Forest, the Forest Service is deferring to the Park Service for a recommendation to Congress for this river as well.

The Olympic National Park draft plan should make concrete recommendations to Congress on which rivers to include in the national Wild and Scenic Rivers system. Detailed eligibility studies of Olympic's rivers have been completed by the Forest Service, and the Park Service has made its own preliminary analysis, providing a solid basis upon which to make recommendations. The Park Service should recommend the rivers that it has already found eligible in the preliminary analysis and/or that the Forest Service has found eligible (including but not limited to those enumerated above), for inclusion in the national Wild and Scenic Rivers system.

If the Park Service believes it needs to do a further round of detailed eligibility studies before it can make recommendations to Congress, it is required under the Wild and Scenic Rivers Act and Olympic National Park management policy to do so as part of this planning process, as noted above. Additionally, the fact that the Forest Service is deferring to the Park Service for any further studies and recommendations to Congress on Wild and Scenic Rivers adds even more urgency to addressing this issue during the current planning process.

Wild and scenic rivers was identified by the public in the scoping process for the Olympic National Park general management plan as far back as 2001, as a topic that should be included in the plan:

"The GMP should include an inventory of the Park's 11 major river systems to determine their eligibility for inclusion in the national Wild and Scenic Rivers System. The plan should include the Park's recommendations to Congress. The Forest Service completed its assessment as part of the Olympic Forest Plan in 1990, but the Park is the major caretaker for the peninsula's rivers...With the fate of salmon stocks at issue, future designations – and resulting river-specific, multi-agency management plans – may play key roles in preserving salmon habitat peninsula-wide." (Olympic Park Associates letter to Cliff Hawkes, October 10, 2001)

Proposed Alternatives

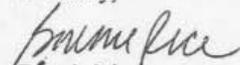
We are also very concerned about several aspects of the Preferred Alternative (D) in the draft management plan, particularly its overall emphasis on visitor access and retaining road access in river corridors, vs. protecting natural river processes and critical fish and wildlife habitat, including spawning grounds for endangered salmon. We are concerned about the lack of designated river protection zones (as proposed in Alternative B) in the Preferred Alternative. As noted in the draft plan, "Water could be considered a unifying theme on the Olympic Peninsula." Many of the rivers on the Olympic National Park are large, wild, dynamic rivers containing some of the best remaining habitat for ESA-listed fish. The U.S. Forest Service's 1990 Land and Resource Management Plan for the Olympic National Forest notes that fish are an "outstandingly remarkable value" that qualifies the Hoh, Quinault, Dosewallips (regionally significant), Duckabush, Dungeness, Gray Wolf, Humptulips, Sol Duc, and Wynoochee Rivers for Wild and Scenic status.

Protection of these species and the river corridor should be the highest priority. Maintaining year-round road access in river valleys such as the Hoh, Quinault, Queets and Dosewallips through bulldozing, placement of rip-rap and other means can have serious adverse impacts on listed species.

We support protection of five key watersheds and critical fisheries habitat through expansion of the Park's boundaries, as proposed in Alternative B. The Preferred Alternative leaves out important protections for the Hoh and Quinault river systems.

We appreciate the opportunity to comment on the Draft General Management Plan. American Rivers' staff enjoys good, long-standing relationships with Olympic National Park staff, and we look forward to continuing to work together to protect and educate the public about the park's outstanding river resources.

Sincerely,



Bonnie Rice

cc Nancy Hendricks, Olympic National Park

Comment 8, 498-American Whitewater

PEPC 191016-8,498



Thomas O'Keefe
Pacific Northwest Stewardship Director
3537 NE 87th St.
Seattle, WA 98115
okeefe@amwhitewater.org

Electronically submitted olym_gmp@nps.gov

29 September 2006

Olympic National Park Draft General Management Plan
National Park Service
Denver Service Center
P.O. Box 25287
Denver, Colorado 80225

Courtesy hard copy

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OCT - 3 2006

DSC-P

Dear Superintendent Laitner:

American Whitewater appreciates the opportunity to comment on the Draft General Management Plan (hereafter GMP). The staff from Olympic National Park (hereafter Park) and the Denver Service Center have done an excellent job of coordinating public meetings, sharing information with the public, and developing a draft plan that is thoughtfully organized and professionally presented. We appreciate the investment the National Park Service has made in producing a quality document with maps and accompanying text that clearly illustrate alternatives. This recognizes the significant investment members of the public have made throughout the planning process. This plan is important because it represents the first comprehensive planning effort undertaken by the Park since 1976, and the final document will provide guidance and long-term vision for the next 15-20 years.

Interest of American Whitewater

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 6,500 members and 100 local-based affiliate clubs, representing approximately 80,000 whitewater paddlers across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. Founding principles of our organization include protection of the wilderness character of waterways and promotion of the recreational value of wilderness rivers.

As a conservation-oriented paddling organization, American Whitewater has an interest in the rivers of the Olympic Peninsula. A significant percentage of American Whitewater members reside in the Pacific Northwest and regularly take advantage of the opportunities for wilderness exploration that the Park offers. While the recreational opportunities are important we place a high value on protecting naturally functioning river ecosystems, including their fish and wildlife, geomorphic processes, and incredible riparian forests where natural successional processes dominate and produce a rich mosaic of vegetation patches. The Olympic Peninsula has been referred to as an "Island of

Rivers,¹ and the Draft GMP refers to water as a “unifying theme” of the Park.² The river systems are thus defining landscape features of the Park that are highly valued by our membership and the general public.

Our members regularly take advantage of opportunities to explore the wilderness rivers of the Park. The National Park Service is directed to “provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the superlative natural and cultural resources found in the parks.”³ The rivers are clearly a superlative natural feature of the Park, which is unique for the diversity of wilderness river opportunities in the conterminous United States. For comparable opportunities one has to travel to Alaska or Canada, and with rainfall totals of more than 15 feet per year, the Park provides an incredible number of river miles in a small geographic area. Exploring the Park’s rivers by hand-powered craft affords visitors with a unique opportunity to experience park resources, promotes enjoyment of the river and riparian landscape, and provides inspirational opportunities to experience wild rivers. Congress enacted the Wilderness Act “to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions”⁴ The Wilderness Act describes “wilderness” as an area that has “outstanding opportunities for ... a primitive and unconfined type of recreation.”⁵

There are a number of rivers that our membership regularly enjoys in the Park. Unlike nearby rivers in Olympic National Forest the rivers in the Park offer unparalleled and unique opportunities for wilderness exploration. Rivers in the Park provide opportunities for primitive unconfined recreation where individuals have freedom to explore, can practice self sufficiency, and engage in a direct experience with the natural environment. The following are the primary rivers that provide this experience.⁶

- Elwha River: The Elwha is perhaps one of the most visible expert whitewater runs in the Park that attracts visitors from across the country who come to experience wilderness opportunities on the Grand Canyon of the Elwha and Rica Canyon. Intermediate paddlers enjoy the front country paddling opportunities below Glines Canyon Dam on a reach that continues to the park boundary. The headwaters of the river reach into the interior of the Olympic Peninsula and the river cuts a path through the major geologic strata of the Olympics on its path to the sea. Traveling down this river one has a unique opportunity to experience the geologic history of the Olympic Peninsula
- Gray Wolf River: River trips begin in the Park at Three Forks and continue through the Buckhorn Wilderness to Dungeness Forks in Olympic National Forest. The river offers unique opportunities for wilderness exploration.

¹ Beres, N., M. Chandler, and R. Dalton. 1988. *Island of Rivers*. Pacific Northwest National Parks and Forests Association. Seattle.

² Olympic National Park, Draft General Management Plan, May 2006, at page 100.

³ 2006 NPS Management Policies at page 157.

⁴ 16 U.S.C. § 1131(a)

⁵ 16 U.S.C. § 1131(c)

⁶ Descriptions and photos of these rivers can be found on our website at <http://www.americanwhitewater.org> and in the guidebook: Korb, G. 1997. *A Paddler’s Guide to the Olympic Peninsula*.

- Dosewallips River: The Elkhorn Canyon run on the Dosewallips begins at the base of Dosewallips Falls and continues downstream past the Park boundary. This river challenges regional experts who currently hike in past the road washout on Forest Service land to access this run. While the road provides convenient access the river itself provides a wilderness quality experience.
- North Fork Skokomish: The North Fork Skokomish provides opportunities for expert paddlers who hike six miles up the Skokomish Trail and paddle back down to Staircase. The river offers spectacular opportunities for wilderness adventure along sections of the river inaccessible by trail.
- Quinault: The Quinault River offers opportunities for paddling adventures on an intermediate river in the front country areas of the Park. The river is popular for fishing along the reach above Lake Quinault. Hike in wilderness boating opportunities are available upstream of Graves Creek.
- Quinault Gorge: The Quinault Gorge begins at the Pony Bridge and ends at Graves Creek. Expert paddlers hike in to run this wilderness river through a gorge that is inaccessible except at river level.
- North Fork Quinault: The gorge on the North Fork Quinault is well known as one of the most scenic wilderness sections of river in Olympic National Park. Every summer when flows drop to suitable levels, experienced paddlers hike in 12 miles on the North Fork Trail to Geoduck Creek.
- Tshletshy: This creek in the Queets River drainage is accessed by hiking up Big Creek Trail out of the Quinault drainage. This creek offers unique opportunities for wilderness exploration through a remote river canyon that passes through some of the park's most impressive old-growth forest. No trails pass through this remote region of the Park providing a unique opportunity to explore the Park's primeval wilderness areas.
- Sam's: The river is one of the more accessible rivers in the Park because the put-in can be accessed from Forest Road 2180 and the first few miles of river are on National Forest lands. The river ends by skirting the boundary of the Park before joining the Queets at the Queets Campground in the Park.
- Queets: The Queets Trail heads 16 miles up river from the Queets Campground to Pelton Creek. Wilderness paddling opportunities suitable for intermediates are available on this section of river for those willing to hike in and some individuals have explored the section upstream of Pelton Creek. The section from the Queets Campground to Hartzell boat launch provides roadside access in the front country zone and is popular for those who enjoy the fishing opportunities the Queets offers.
- South Fork Hoh: Individuals can hike in on the South Fork Hoh Trail and run a section of river that continues past the Park boundary. This is an easy day trip for paddlers through a short segment of wilderness.
- Hoh: The majority of paddling opportunities on the Hoh begin at the boat launch located just inside the Park boundary. Some individuals have hiked up the Hoh Trail to experience wilderness paddling opportunities available on upstream reaches.

- **Bogachiel:** The Bogachiel offers one of the most spectacular wilderness paddling opportunities on a west side river. Access is available by hiking up over the ridge from the Sol Duc and dropping into the Bogachiel drainage.
- **South Fork Calawah:** Access is available from Rugged Ridge on Forest Service land that provides convenient hike-in access to this river that provides a wilderness boating opportunity suitable for intermediate paddlers.
- **Sol Duc:** This river provides one of the more popular intermediate paddling opportunities in the Park. Paddlers typically begin at Salmon Cascade and can continue out past the Park boundary onto Forest Service land. The fact that this river is in the front country zone makes it accessible as an easy day trip. With the exception of the section just downstream of Salmon Cascade, the road is largely hidden from the river providing a high quality aesthetic experience for those on the water.
- **North Fork Sol Duc:** An easy hike makes this river accessible as a day trip through wilderness for intermediate paddlers that can be enjoyed during the winter rainy season.

Paddlers who have enjoyed the wilderness rivers of the Park for the past several decades have developed a deep appreciation for the unique resources these rivers provide. While some rivers such as the Elwha are well-known classics, the wilderness setting and diversity of rivers allows individuals to find solitude and explore areas of the park where one can find new adventures and rivers to explore. Individuals have a unique opportunity to experience the sense of adventure akin to that of those who explored the Olympic wilderness prior to the creation of the Park. Jason Rackley, a paddler who has written extensively of his explorations in the Olympic wilderness, refers to the Park as one of the “last frontiers” for wilderness river exploration in the Pacific Northwest.

While we are a relatively small segment of backcountry users in the Park we recognize that all visitors have an impact on the environment. River exploration within the Park has similar impacts as hiking, backpacking, and backcountry fishing although use of a trail is one way with the river serving as the return route. We support continued management of backcountry users as outlined in the Draft GMP where hand-powered boating is recognized as a wilderness-compliant activity for all three wilderness zones. Some of the Park’s rivers provide overnight opportunities but the majority of use is for day trips. An important element of our public education efforts focuses on establishing a wilderness ethic for paddlers who explore wilderness rivers. We regularly publish articles in our journal to educate paddlers on safety issues that must be considered on wilderness trips and the importance of practicing Leave No Trace principles including the need to carry rather than drag boats.⁷

Comments on Roads Along Rivers

We recognize that roads provide important corridors for access into the Park. The

⁷ See Bousquin, J. 2005. Minimizing impact on California’s upper Cherry Creek. *American Whitewater Journal* 46(3):50-53; and feature edition on *Wilderness Paddling*, *American Whitewater Journal* 46(5).

problem is many of these roads pass through sensitive riparian areas and disrupt natural river function and processes. While the access that roads provide is important to recreational users including the constituency we represent, the impacts they have when they pass through channel migration zones can severely disrupt both ecological processes and aesthetic qualities of the river. Over the past 5 years we have seen new retaining walls, rip rap, and fill along the Quinault, Queets, Hoh, and Sol Duc. These highly engineered solutions distract from the very qualities that make these river such an incredible resource in a region where very few miles of undisturbed wild rivers remain. Convenient roadside access is available along several miles of river in Olympic National Forest and what makes the Park unique is the opportunity to have a wilderness river experience. Rivers in the Park should be managed to provide this experience.

While relocation of wilderness boundaries is a sensitive topic for discussion we believe it is appropriate to explore this option as a common-sense alternative to moving roads outside of the channel migration zone and onto more stable glacial terraces. This would only be acceptable under the condition that there would be no net loss of total wilderness. In some cases it may make sense to decommission roads and we support critical evaluation of this alternative, but in other cases where a public need for access is documented we would like to see alternate access routes outside the channel migration zone explored as an alternative. An excellent example where this alternative could be implemented is along the Queets River where a parallel road on National Forest lands could provide alternative access (see site specific comments below). Where feasible, moving roads out of channel migration zones, could provide a more stable road network that can be maintained and that will have reduced ongoing resource impacts such as we currently observe on rivers like the Hoh.

Alternative B offers an intriguing possibility for management of river floodplains along major west side rivers including the Hoh, Queets, and Quinault by establishing a “River Zone”. We are supportive of this concept and believe it should be implemented along at least one of these rivers. Recent research, much of it conducted within the Park over the past decade, has significantly advanced our understanding of natural river function and process and the importance of floodplain connectivity.⁸ Historically we only considered the wetted channel when implementing management actions along river corridors. We now have a much great understanding of the dynamics of large floodplain rivers and the importance of these dynamics for river function,⁹ There are few rivers in the entire country where one can observe the natural processes that operate on these west side rivers. The Park has a responsibility to update current management practices to reflect our current scientific understanding of the importance of dynamic rivers for overall ecosystem health. In addition these rivers serve as critical natural laboratories that provide the knowledge informing management and restoration of rivers throughout the

⁸ See Van Pelt, R., T.C. O’Keefe, J.J. Latterell, R.J. Naiman. 2006. Riparian forest stand development along the Queets River in Olympic National Park, Washington. *Ecol. Mongr.* 76(2):277-298; and Latterell, J.J., J.S. Bechtold, T.C. O’Keefe, R. Van Pelt, and R.J. Naiman. 2006. Dynamic patch mosaics and channel movement in an unconfined river valley of the Olympic Mountains. *Fresh. Biol.* 51(3):523-544.

⁹ See O’Connor, J.E., M.A. Jones, T.L. Haluska. 2006. Flood plain and channel dynamics of the Quinault and Queets Rivers, Washington, USA. *Geomorphology* 51:31-59.

Pacific Northwest's temperate rainforest.¹⁰

Comments on Wild and Scenic Rivers

A preliminary analysis has determined that 13 rivers or river segments are eligible for designation as part of the Wild and Scenic Rivers system. These rivers include the Bogachiel River, Ozette River, Calawah River, Queets River, Dosewallips River, Quinault River, Duckabush River, Royal Creek, Elwha River, Skokomish River, Gray Wolf River, Sol Duc River, and Hoh River. An eligibility report has been completed for the Elwha River with the section from the mouth to Mills Reservoir found eligible following removal of Elwha and Glines Canyon Dams, and the section from Mills Reservoir to the headwaters eligible under current conditions. While an eligibility study has been completed for the Elwha, the Draft GMP states that "no formal eligibility studies have been conducted for the remaining eligible rivers... Further studies of eligibility will be conducted after completion of this general management plan, so this topic is dropped from further environmental analysis."¹¹

We are disappointed that the Draft GMP proposes to drop further analysis or recommendation of rivers, other than the Elwha, for inclusion in our nation's Wild and Scenic Rivers system. Many of the rivers identified clearly represent the nation's most appropriate candidates for Wild and Scenic designation, and an eligibility determination is necessary to complement planning efforts on Olympic National Forest. Given the importance of the Park's rivers to the public and their status as defining features of the Park, eligibility of Wild and Scenic Rivers should be one of the Park's highest priorities.

Wilderness

While our primary focus is on rivers we have a strong interest in their watersheds including the wilderness qualities of the landscape. A wilderness management plan for the Park needs to be completed. In general we find that the Park places an overemphasis on historic preservation and not enough emphasis on natural resource preservation and restoration. For example the Park has focused recent efforts on replacing historic structures while ignoring the need to restore extirpated species such as wolves that have been successfully reintroduced in Yellowstone National Park and other places across the West. We believe the focus of Wilderness management should be on the restoration and preservation of the Park's ecosystems. Historical structures can be documented through narratives and photographs.

Visitor Services

Decisions on visitor services should recognize the fact that the Park is largely a wilderness area. The fact that there are no major cross-park roads that penetrate the

¹⁰ See Naiman, R.J., H. Décamps, M.E. McClain. 2005. *Riparia: Ecology, Conservation, and Management of Streamside Communities*. Elsevier. Boston; and Mapes, L.V. 2005. A river reigns through it: in a unique living lab, the web of life is revealed. Pacific Northwest, *The Seattle Times Magazine*, January 30, 2005.

¹¹ Olympic National Park, Draft General Management Plan, May 2006, at page 51.

interior of the Park is unique among the major National Parks of the West. New or expanded interpretation and education facilities should be developed outside the park for the benefit of local communities and the integrity of park resources.

Site Specific Comments and Recommendations

In addition to our general comments above we provide the following site specific recommendations corresponding to major river systems where we have an interest in future management.

Elwha

For almost two decades American Whitewater has been a stakeholder in the effort to remove Elwha and Glines Canyon dams. Removing these dams would restore one of the signature rivers of the Olympic Peninsula. We note that the Preferred Alternative states that “additional camping and hiking trails would be considered within the Elwha drainage (former Lake Mills).”¹² While we are supportive of fully capitalizing on opportunities to highlight educational activities associated with this dam removal that will have national significance, we urge caution and support limitations on the level of infrastructure development so the public has an opportunity to see but not disrupt ecosystem recovery. For the short term we do not believe new camping areas are appropriate on lands exposed by draining the reservoir.

Quinault

The south park boundary upstream of Lake Quinault should be adjusted to include the full channel migration zone of the Quinault River. Adjusting the current park boundary would improve the ability to more effectively manage and protect elk populations that utilize the river floodplain. We believe a boundary adjustment along this river should be a long-term goal as parcels become available. The Finley Creek bridge should be removed or replaced with a more suitable solution. We support further exploration of alternatives to relocate roads outside of channel migration zones.

Queets River

Currently there are parallel road networks within the Park and on National Forest lands. The Queets Road within the Park follows the river through the channel migration zone and across terraces composed of fine-grained sediments that are slumping into the channel. At the Matheny Creek river crossing the bridge is undersized and fill is replaced on a regular basis in an attempt to preserve this crossing. In contrast the Forest Road 21 and 2180 spur are paved, cross Matheny Creek along a section of the river that is bedrock controlled rather than alluvial, are well outside sensitive riparian areas, and pass within a mile of the Queets Road where a gated connector road could provide a potential alternative route into the Queets Campground and boat launch. The Park should seriously explore an alternative of decommissioning the Queets Road upstream of Hartzell boat launch and providing alternate access to the campground and boat launch through a partnership with the Forest Service utilizing Forest Road 21 and 2180.

¹² Olympic National Park, Draft General Management Plan, May 2006, at page M12.

The Queets river offers the most significant opportunities for designation of a River Zone as outlined in Alternative B and we believe this alternative should be fully explored. We support the boundary adjustment on the north side of the river near Lyman Rapids as well as public and private partnerships to assist in comprehensive watershed protection efforts.

Hoh

We support exploration of alternatives to move the Hoh River Road out of the channel migration zone and potentially relocate visitor facilities. We believe there are significant opportunities for new interpretive facilities outside the river floodplain and this should be the long-term vision. Boundary adjustments to bring the confluence of the South Fork Hoh within the Park should be explored. As part of any effort to pursue this, public hike-in access to the confluence area from the south side should be considered.

For many park visitors the Hoh is the gateway, and for some their only introduction, to the west side rivers and old-growth forests that line their banks. Because of this there are important public outreach opportunities. The Draft GMP notes that “outdated exhibits do not adequately present the key interpretive themes as they relate to the rainforest environment.”¹³ We believe that there are significant opportunities to more effectively communicate the attributes of natural river systems. Interpretive trails at the Hoh River visitor center focus on mature forests but provide limited information on the river or the network of wall base channels and wetlands representing the past legacy of channel migration. For many visitors this may be their only opportunity to see a large floodplain river that is allowed to migrate across its floodplain and this is an important educational opportunity.

Sol Duc River

The preferred Alternative D retains seasonal road access that could be adjusted depending on weather. We wish to see access to Salmon Cascade through the first weekend in December. In some years the road is closed before any snow covers the first 7 mile segment of road up to Salmon Cascade. Through the period of fall and winter rains the Sol Duc River provides some of the best opportunities for a day trip on the water, and the river is well known as one with simple logistics. Closing the gate before snow covers the road significantly complicates logistics.

Opportunities to move the road out of the channel migration zone, particularly in the area downstream of Salmon Cascade, should be explored. Highly engineered solutions to place the road along the side of the river have had a negative impact on the scenic qualities of this river.

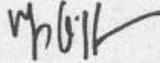
Conclusion

Thank you for the opportunity to comment on the Draft GMP. We request that we remain on the mailing list for any future updates or opportunities for public input. We have

¹³ Olympic National Park, Draft General Management Plan, May 2006, at page 147.

greatly valued our relationship with Park staff. Please do not hesitate to contact us if you have any questions regarding public use of rivers in the Park.

Sincerely,



Thomas O'Keefe
Pacific Northwest Stewardship Director

cc:

Nancy Hendricks
Olympic National Park
600 East Park Avenue
Port Angeles, WA 98362-6798

Washington Kayak Club
P.O. Box 24264
Seattle, WA 98124

Paddle Trails Canoe Club
P.O. Box 24932
Seattle, WA 98124

University Kayak Club
University of Washington
Campus Box 354090
Seattle, WA 98195

Washington Recreational River Runners
330 SW 43rd St., Suite K, PMB# 501
Renton, WA 98055

Comment 565-Backcountry Horsemen of Washington



BUCKHORN RANGE CHAPTER
BACKCOUNTRY HORSEMEN OF WASHINGTON
P.O. Box 845, Chimacum, WA 98325

PEPC 191202-565

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OCT - 4 2006
DSC-P

Cliff Hawkes
Olympic National Park - GMP
National Park Service
Denver Service Center - Planning
P.O. Box 25287
Denver, CO 80225

September 17, 2006

RE: General Management Plan - Ability to Adjust Trail Zone Boundaries

When considering the designation of trail zones, it is important that some flexibility exists to adjust zone boundaries due to the need to relocate existing trail locations. It is our experience that natural events, such as those that result from the impacts of snow and water (mud slides, river course changes, erosion), earthquakes, rock fall, and other changes, can cause impacts on existing trails that are prohibitive to repair without relocating trail routes to different more stable areas. There are also failures of man made structures (bridges, puncheons, etc) where the cost effective alternative is to relocate a trail to an area which does not require structures.

The General Management Plan needs to provide for flexibility whereas trail zones can be adjusted or moved through a process which maintains existing uses without a net increase in detrimental environmental impacts.

Additionally, there will occur impacts to trails which may make stock use impassable until repairs can be completed. With funding shortages, the timeframe for repairs may be measured in years rather than in months. The ONP should refrain from changing trail classifications as a way of permanently closing trails to stock in order to reduce trail and trail infrastructure requirements to a lesser and more financially maintainable level. Obstacles and hazards may close a trail to stock - but only until such time that the obstacles can be removed, the hazards can be addressed, and the trail can be restored.

Sincerely,

JEFF CHAPMAN
Jeff Chapman,
Director, Buckhorn Range Chapter BCHW

Comment 566-Backcountry Horsemen of Washington



PEPC 191204 - 566
BUCKHORN RANGE CHAPTER
BACKCOUNTRY HORSEMEN OF WASHINGTON
P.O. Box 845, Chimacum, WA 98325

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OCT - 4 2006
DSC-P

Cliff Hawkes
Olympic National Park – GMP
National Park Service
Denver Service Center – Planning
P.O. Box 25287
Denver, CO 80225

September 16, 2006

RE: Dosewallips Access and Use

The primary arterial into the Olympic National Park from the east side for pack stock is via the Dosewallips drainage. The maintenance and supply access point has been in the past near the upper Muscott Flats Dosewallips campground. At one time, there was a horse camp down the road from the main campground - which was near the river. This site is mostly destroyed now due to the river changing course.

Due to the road washout in the Olympic National Forest, the Dosewallips campground has been cut off to motorized traffic, and use of the campsites has been dramatically reduced. As it is, this campground has a large enough area to accommodate both hike-in traffic and stock use. Some stock items (hitching posts) have been added to address the need for stock facilities.

When the road was still open to motorized vehicles, recreational users pulling horse trailers would either brave the hill past the falls, or park below at Elkhorn Campground or across 10 mile bridge. If parking below, you could then ride up the road over Constance Creek, though traffic made this trip less pleasant for recreational riders than it has been while vehicular traffic is cut off.

Planning for use in the Dosewallips drainage must deliberately address continued stock access. Even ONP maintenance crews pack tools and supplies in using this route. Should restoration of motorized access to Muscott Flats occur, ONP needs to continue to provide a suitable place for a stock camp near the road end.

In addition to continued maintenance of the existing road, we also support any effort to establish an additional off-road corridor trail, including the possibility of a non-motorized route south of the river which would run between 10 mile bridge in the Olympic National Forest and the upper campground.

Sincerely,

JEFF CHAPMAN
Jeff Chapman,
Director, Buckhorn Range Chapter BCHW

Comment 584-Backcountry Horsemen of Washington

PEPC 191225-584

Olympic National Park
Draft General Management Plan
 Summer 2006

National Park Service
 U.S. Department of the Interior

COMMENT SHEET ONP - GMP

We welcome your comments on this project. The comment period closes on **09/30/2006**. Your comments must be delivered or postmarked no later than **09/30/2006**.

You may complete this form and provide it to the NPS at one of the open houses, or you may send this form and/or your letter to:

National Park Service
 Denver Service Center - Cliff Hawkes, DSC-P
 12795 West Alameda Parkway
 PO Box 25287
 Denver, CO 80225-9901

RECEIVED
 OCT - 2 2006
 DSC-P

It is the practice of the NPS to make comments, including names, home addresses, home phone numbers, and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives of or officials of organizations or businesses, available for public inspection in their entirety

Personal Information

First Name: *Lori* Middle Initial: *A*

Last Name: *Lennox*

Organization: *Backcountry Horsemen of WA, Grays Harbor Chapter Director*

Address 1: *82 O'Neill Rd.*

Address 2:

City: *Elma* State/ Province: *WA*

Postal Code: *98541*

E-mail: *llennox@centurytel.net*

Keep my contact information private. Provide justification:

Please use below and the back of the paper for your comments. Attach extra sheets as necessary. Please print or write clearly.

Dear NPS,
Please keep stock trails in the ONP open to AT LEAST the current miles. More if possible! The more miles there are the safer the trails, the less traffic, congestion, conflict there will be as folks can disperse themselves.

As Americans "grey" (Bromers) more & more are finding that they can get around a lot easier on horses & mules than they on aging knees & joints. Please don't shut down access to these people.

LH

And the more stock trails there are, the easier it is to maintain a large majority of all trails as pack stock can be used to provide manpower & supplies.

As a resident of Grays Harbor on the Olympic Peninsula, I can see the population growing by leaps & bounds. Many come for the recreation opportunities. Please consider facilities & trails for the increasing numbers of people wanting to use the awesome, beautiful Olympic National Park on horses & mules.

Thank you.

Lori Sennoy

Comment 533-Backcountry Horsemen of Washington



PEPC 191164 - 533

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OCT - 2 2006

DSC-P

Olympic National Park GMP,
NPS Denver Service Center - Planning
P.O. Box 25287
Denver, CO 80225

September 26, 2006

RE: Comments on Draft General Management Plan/EIS for the Olympic National Park

The Backcountry Horsemen of Washington is an organization comprised of recreational and pack stock users throughout the State of Washington who are dedicated to preserving our historical use of horses and mules on public lands. We do this not just as users, but as working volunteers who every day of the year can be found on our public trails packing tools, supplies, and crews; building puncheons, bridges, and turnpikes; repairing trails with Pulaskis, McLeods, and shovels; and cutting out brush and logs. There isn't a federal forest or national park in Washington State that hasn't had members of our volunteer organization investing time and labor into keeping their trails open for the citizens of our nation to enjoy.

Stock use on the Olympic National Park (ONP) dates back to a time before the park was conceived. Horses and mules were historically the means by which supplies and pioneers moved around the inland areas of Washington State. Trails were laid out through the Olympic Mountains for stock to pass on. Even the famous Press Expedition used saddle and pack stock to cross through the Olympics. Park Service and Forest Service holding facilities were built around the Olympic Peninsula to accommodate the horses and mules used by federal employees to steward the federal lands in the area, much of which came under Wilderness designation after Congress passed the Wilderness Act of 1964. Stock use continued after that time, and even today, the Olympic National Park maintains a federally funded pack string to perform trail maintenance throughout the ONP.

Development of the General Management Plan for the Olympic National Park is being done under the guidelines of the 1969 National Environmental Protection Act (NEPA) as well as Director's Order 12 of the National Park Service which specify a range of alternatives utilizing the NEPA process. NEPA is guided by several principles stated in the act including "3. Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences." and "4. Preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice." (Title 1, Sec 101(b)). It is these principles, among others, which should guide the development of policies in the General Management Plan under NEPA.

Clearly, recognition of the role horses and mules have played in our state's history is a testament to the historic, cultural, and beneficial roles of stock to our society, particularly in the transporting of people and goods on public roads and trails, including those in the Olympic National Park. Our organization's successes are a testament that stock users educated with fundamental respect and appreciation for the well being of our environment, augmented by Leave No Trace principles, can effectively share trails with other users without causing any meaningful or even noticeable degradation of environmental elements. Due to the rugged nature of the Olympic National Park as well as limited access points from populated areas, stock use in the park is consistently low use - well below any volume levels that would cause undo stress from overuse. In return for providing trails for stock use, trails are much more likely to receive needed maintenance since tools, gravel, supplies, and people can be brought in using horses and mules. Ecosystem recovery time from low elevation grazing is relatively short due to the wet conditions in the Olympic Mountain area. In fact, many areas have had stock traffic for many decades, and yet in the spring, there is barely a sign that a horse has ever passed through.

There is no reason to limit stock use below existing levels. NEPA concerns are well satisfied under existing use patterns. The only real issue is that trail standards for stock use require more maintenance and infrastructure than hiker only traffic. This may be true, but the benefit of using stock for packing offsets to a large degree this issue. We do understand that due to environmental changes such as slides and flooding rivers, trails can suffer damage that may make them unsafe for load bearing horses and mules. Temporary closures to stock until repairs can be made may be necessary. However, we do not



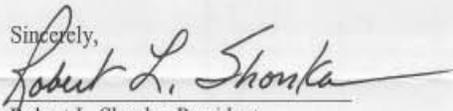
support any efforts to permanently lower maintenance expectations by zoning away access rights to stock as a quick fix to financial woes where federally funded budgets consistently fall short of maintenance backlogs.

The General Management Plan proposes the establishment of Management Zones. For the most part, stock is prohibited in most of the zones with the exception of some of the trail zones and trailheads. Zoning is fundamentally a governmental tool to set boundaries for regulatory limitations. In the ONP wilderness, the bulk of the land area is to be placed in Primeval and Primitive Zones, both excluding stock. This does not appear to be a big issue currently since these areas are virtually void of trails and are not used by stock at present. However, zoning horses out means there never will be the opportunity for horses to utilize these areas should trails be built or circumstances change, which leaves the only backcountry access open to stock a prescribed subset of trails in the Wilderness Trail Zone.

Our requests are then:

- That any trails open to stock currently remain open to stock.
- That any horse camping areas currently open to stock remain open to stock, including those above 3,500 feet.
- That there be a zone adjustment system that will allow trails and/or roads to be relocated due to unstable conditions or natural events that necessitate relocation of trails and/or roads to more stable locations.
- That any existing structures used for stock camping, tie-ups, addressing trail hazards, or provided at parking areas, including the parking areas themselves, be kept available and open to repair and maintenance either by ONP staff or by volunteers.
- That the weed free certified feed requirement be implemented and enforced based on best management practices, availability of certified feed, and education of users.
- That Wilderness should be managed with a balance between preservation and public access under the principles set forth in the Wilderness act. Stock use on Wilderness trails, where appropriate, should remain open to all stock users, not just to special permitted Park Service approved pack strings or saddle horses.

It is well documented that our nation has been leaving the outdoors and moving into less physically active sports for their recreational pastimes. There are less backpackers on the trails, less hikers, and less horse riders than in prior generations. Our citizens are experiencing increased obesity, more health problems, and increased anxiety. The solution is to get them outdoors; get them back in touch with the magnificence of nature. But they can't get to the outdoors if land managers promulgate programs and management plans that continually keep the door closed. Keep the Wilderness open to visitors who come by foot – or by pack and saddle stock.

Sincerely,

Robert L. Shonka, President
Backcountry Horsemen of Washington
110 W. 6th Avenue, PMB 393
Ellensburg, WA 98926
Bobshonka@verizon.net

Comment 470-Bellingham Bares

PEPC 190977 - 470

Name: Roman F. Stadler
Organization: Bellingham Bares
Organization Type: I - Unaffiliated Individual
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Correspondence Information

Status: New **Park Correspondence Log:** 190977
Date Sent: 09/30/2006 **Date Received:** 09/30/2006
Number of Signatures: 1 **Form Letter:** No
Contains Request(s): No **Type:** Web Form
Notes:

Correspondence Text

Hello! I'm writing in regard to the proposed changes to the Olympic Hot Springs area of the park. My friends and I often travel to Olympic National Park (a distance of well over a hundred miles) specifically for the hot springs. We prefer being clothing optional in nature; it feels natural, it's low impact, as we respect the resources and are concerned stewards of any area we enjoy (not only for all the usual reasons, but also for practicality, it's hard to enjoy being bare outdoors if you have to beware of broken bottles, etc!). We're concerned that rehabilitation means removal, which would be terrible as these are some of the most beautiful hot springs I've been to! We don't believe any of the four proposed alternative(A,B,C,D) management plans adequately addresses Olympic Hot Springs.

Please consider the following points:

- 1) Keep soaking at Olympic, but reduce the number of pools at the site to three or four, located near the main source. This would keep flow-through high, maintaining cleanliness. It would help rehabilitate the runoff area, reduce the impact of use and enhance the environmental integrity.
- 2) Contract the mainenance of the resource to an experienced caretaker. This is very effective with other hot springs in the pacific NW, such as Goldmeyer Hot Springs.
- 3) Change the road (Olympic Hot Springs RD) to a trail beyond the Altair site.

Please consider that rehabilitation does not require that the resource be made unusable for those of us seeking more remote recreational experiences (without the hot springs, I wouldn't be making the trip to the park, as sharing space with rv families is not a natural experience for me). Other details of the NPS preferred plan, (D), accomodate traditional use, and the traditional clothing optional use at Olympic Hot Springs should be retained. Thanks! Roman Stadler

Comment 552-Clallam Bay Sekiu Advisory Council

PEPC 191188 -552

Clallam Bay Sekiu Advisory Council

Carla McConnell
Olympic National Park – GMP
National Park Service
Denver Service Center - Planning
P.O. Box 25287
Denver, CO 80225

September 25, 2006

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OCT - 4 2006
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Dear Miss McConnell,

Thank you for an opportunity to comment on the Draft General Management Plan for Olympic National Park.

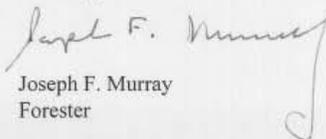
I recently attended an open house sponsored by the Park. The Park staff was on hand to inform the public of their plans. Comments were accepted in writing and by taped recordings. It was unfortunate that an open public forum at which local citizens could speak was not allowed, because the passion of an individual's position was lost to the Park as well as to the other participants.

"However, the four county region is not affected due to the size and diversity of the regional economy." This conclusion is stated in the section "Local Economies" under the part of the document titled "Impacts to the Socioeconomic Environment." This seems to show the Park's lack of understanding of our local economies. The local economy in the Clallam Bay/Sekiu area and other parts of the Western Olympic Peninsula, essentially the economy on the West End is driven by natural resources and tourism. The East side of Olympic National Park has larger more diversified economies in the urban areas. Most of commercial forest land that would become part of the Park is on the west side of the Peninsula, this will cost direct job loss to those employed in the forest as well as in the communities supported by the forest. Your preferred 'Alternative D' will cost our community jobs which are essential to our socioeconomic environment.

Reducing motorize boating would reduce local and tourist use of the Ozette Lake and corresponding economic activity. This is yet another example where the Park has overlooked the interests and economic well being of our West End communities.

Perhaps these comments will inspire the Park to reassess their beliefs about the West End and develop an understanding of the people who live and work in the area. The Park provides numerous public presentations, solicits written and taped comments, and goes to great lengths to include this input in publications to document the public process. It is unclear; however, to what extent this solicited input influences park policies. We would recommend that the Park take a less imperial approach and talk with the people, not at them. Olympic National Park should develop a plan around 'Alternative A' which allows for the maintenance of existing park lands, roads and developed areas. This will provide a balance between the concerns of local citizens and the Olympic National Park as part of our community.

Sincerely,


Joseph F. Murray
Forester

Comment 281-Clallam Bay/Seki Chamber of Commerce



Comment 462-Clallam Economic Development Committee

PEPC 190960-462

Name: Linda L. Rotmark
Organization: Clallam EDC
Organization Type: I - Unaffiliated Individual
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P.O. Box 1085
Port Angeles, WA 98362
USA
E-mail: lrotmark@clallam.org

Correspondence Information

Status: Reviewed	Park Correspondence Log: 190960
Date Sent: 09/29/2006	Date Received: 09/29/2006
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

The Clallam networks Economic Development Board represents the voices of public and private (business) members including representation from the cities of Forks, Sequim, Port Angeles, Clallam County, the Port of Port Angeles, Public Utility District #1 and Olympic Medical Center. At their August 18, 2006 meeting it was resolved to participate in the public comment section of the report. At the September 19, 2006 Board Meeting, Bill Laitner and his associate presented the plan to the Board for their better understanding of the components. The following are bullets representing the Board's position:

We understand and acknowledge the important role that the ONP plays within the region's tourism sector as the most significant draw for visitors to the region.

We also accept the fact that the role of the ONP is multifaceted in its efforts to provide protection to the unique resources and wildlife of the ONP while also ensuring a quality recreational experience for all visitors to the park.

We believe that maintenance of existing infrastructure and improving visitor access must be a higher funding and implementation priority than expanding the ONP boundaries.

We believe that the main focus during the ONP general management planning period should be improving visitor access and their experience in the park by augmenting existing infrastructure with additional bike paths, trails, expanding the use where feasible of mass transit, completion of the Spruce Railroad Trail, expansion of the lodging seasons, development of new campground and visitor facilities. Many visitors come expecting modern facilities capable of adequately serving the existing visitor population, however, many of the ONP's facilities are out dated, overwhelmed and in need of a significant investment in renovation, expansion and modernization. In addition, unless some overwhelming demonstrative and objective analysis indicates a real and present danger to specific unique resources, we are not supportive of the removal of existing visitor points of access to the ONP, or the removal of existing camping sites within ONP.

We believe that there must be continued emphasis on fully funding and expanding the park's interpretive programs, while maintaining and improving its current information centers. Visitors are coming to the ONP for a variety of reasons and we expect each visitor to have the opportunity to learn not only about the natural history of the ONP, but also the cultural and historical significance of the region as well. One of the "unique resources" of ONP that we are adamant about the NPS having a duty to protect and increase the population of within the ONP is the interpretative rangers and the backcountry rangers.

We applaud the effort of the NPS to ensure adequate security is in place within the ONP, however, we believe that the NPS is presuming that a security ranger can also serve as a "stand-in" interpretive and visitor information ranger which is not the case.

We believe that there may be opportunities for the NPS to develop and strengthen working ties with the surrounding communities in addressing the issues of access roads to ONP in unstable areas.

We do not advocate for the removal of those access points, but rather believe that working in cooperation and good faith with the local community stakeholders where such roadways exist would be in the best interest of the community, the region and the ONP.

With regard to land acquisition, we are not supportive of efforts to expand the park at the expense of the livelihood of others in the community. Any acquisition must be the result of fair, good faith, and honest transactions not involving direct or indirect pressures by the federal government to 'encourage' parties to become "willing sellers." Emphasis on land acquisition should be placed on those land owners who approach the NPS seeking to sell their property due to hardship or those land owners that may be surrounded by the NPS and no longer wanting to own their property.

Finally, we applaud the NPS for specifically noting that the ONP staff must be more actively engaged in the communities in and about its borders. However, if this proposal is adopted in the final plan, ONP should be willing to implement it sooner than later and should focus its involvement in ways that increases the community's understanding of ONP activities while aiding in the marketing of the region to the visiting public.

Comment 327-Conservation Northwest



190804-327

Officers
 Board President Alexandra Loeb
 Board Vice-President Bill Donnelly
 Board Secretary Jeffrey J. Bodé
 Board Treasurer Tom Campion
 Executive Director Mitch Friedman

3414 1/2 Fremont Ave. N
Seattle, WA 98103

September 22, 2006

Carla McConnell
Olympic National park GMP
NPS Denver Service Center -- Planning
P.O. Box 25287
Denver, CO 80225

Re: Olympic National Park General Management Plan DEIS

Dear Ms. McConnell,

CNW appreciates this opportunity to comment on Olympic's Draft General Management Plan (GMP). We agree with much of Olympic Park Associates' (OPA) recommendations, and submit these comments in the hope that they will lead to a sound plan and a positive future for this significant, world-renowned natural preserve.

Conservation Northwest (CNW) is a regional conservation organization representing 5,000 members that are dedicated to the preservation of wilderness, old-growth forests, roadless areas, and other regions important to the conservation of Washington's fish and wildlife. We have a long history of promoting conservation on the National Forests and Parks of Washington State, and other public lands. Many of our members use this area for recreation, and we have great interest in assuring that the park will be managed in a way that will preserve its pristine qualities and unique environment.

Our goal for Olympic National Park over the next 20 years is a fully restored ecosystem with its original components, processes and habitat functions intact. Use would be managed to insure visitor enjoyment of the park with the primary focus of protecting the health of its ecosystems throughout the future. We agree, given the park's legal mandates and agency policies, that this should be your goal as well.

Significant changes have taken place since the last management plan in 1976. Roads, logging, and residential development of forestlands now characterize much of the park boundary. Increased recreational use of all types places demands on resources. Cumulative impacts on lower rivers and salmon streams and illegal hunting pressures have harmed park wildlife, fragmented habitats, and impaired ecosystem functions. Visitation to the park has increased dramatically, doubling since 1976.

For a general management plan to deal with these kinds of threats to the future ecological integrity of the park, it must be bold, visionary, and encompass a broad view of Olympic's role in maintaining the larger Olympic ecosystem. Your 1976 master plan provided this kind of guidance for most of the past few decades, but we feel the preferred alternative in the current draft falls short of those goals.

We appreciate and support those recommendations in the preferred alternative (D) that move the plan in this direction. Particularly, we support the following:

- The establishment of intertidal reserves – this issue has been exhaustively discussed by the Olympic Coast National Marine Sanctuary advisory committee. Recommending establishment of the reserves is a bold step, and one to which we hope you will remain committed.

Web and email
www.conservationnw.org
info@conservationnw.org

Main office
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Board President Alexandra Loeb
Board Vice-President Bill Donnelly
Board Secretary Jeffrey J. Bodé
Board Treasurer Tom Campion
Executive Director Mitch Friedman

- The park's intent to recommend boundary expansions to protect habitats for threatened and at-risk wildlife populations.
- A wilderness study for Ozette Lake, Pyramid Peak ridge, and future additions. Ozette is the last coastal wilderness lake outside Alaska and richly deserves protection.
- Wild and scenic river designation for the Elwha, but we fear the significant expansion of the development zone in the valley works against watershed restoration.
- The relocation of the highway and other use facilities within coastal erosion and flood plain zones, which will decrease risks to the public.
- The park's intent to expand educational and interpretive programs, develop short interpretive trails, and encourage mass-transit in high-use areas.

All of these recommendations are a strong start toward a GMP worthy of a World Heritage Site and international biosphere reserve.

In general, however, we find the preferred alternative of the draft GMP to be lacking in the critical qualities mentioned above: boldness, foresight, and sense of the park's place in the larger Olympic ecosystem. The draft is timid in its approach to resource protection, and many of its protective measures are compromised and inadequate to protect park resources into the future. We feel that much of what alternative (B) proposes would provide for a more sound ecological approach to preserving the significant ecosystems that remain within Olympic's boundaries. The lack thereof in the preferred alternative drives several concerns.

Specifically, alternative (D):

- Denies "river protection zone" status to the park's rivers, many of which provide critical habitat for a number of federally listed threatened and endangered salmon stocks. In particular, rebuilding washed-out roads with rock armoring destroys salmon habitat and compounds impacts on fish. The proposed Dosewallips road reconstruction, for example, will harm critical spawning areas for federally threatened Puget Sound Chinook. If the intertidal reserves can be applied, why not include river zones specified in alternative (B) to aid in safeguarding salmon throughout their full spawning cycle. Merely protecting them through the estuary zone is not sufficient.
- Maintains all road access throughout the park, including floodplains, regardless of impacts to salmon habitat and natural river processes. Recommends moving wilderness boundaries on active floodplains to maintain poorly located roads. In particular, continued bulldozing of Finley Creek channel in the Quinault area will continue in the plan, impacting salmon and other wildlife habitats simply to provide year-round access.
- Transforms zoning designation from wilderness into use levels without supporting reference or justification. Wilderness related issues should be guided by a wilderness management plan that considers proposed uses according to their wilderness impact, directed under the Wilderness Act.
- Has proposed boundary expansions that are inadequate to protect down-stream fish species from destructive upstream activities like timber harvest and road building. For example, Ozette Lake sockeye and Puget Sound chinook, listed under the ESA, are at risk as well as spawning areas for the unique Beardslee and Crescenti trout. Park elk populations are also experiencing hunting impacts due to nearby roads.

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Officers
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 Board Vice-President: Bill Donnelly
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 Executive Director: Mitch Friedman

In particular, we find a lack of support for the substantial development expansion. Even though visitor trends are continuing upward, a correlation likely exists with increases in population growth. We cannot continue to supply a limited resource to an increasing demand. At some point visitation will be maximized, and while our limited knowledge of ecosystem connectivity constricts how much of the park we can make available, we have the ability to control visitation if necessary. We ask you to take heed for the future of the park and be cautious as you advance.

We also note that alternative (D), as described on page 68, "...includes slightly more development zone acreage in the frontcountry when compared with alternative (B), and slightly less than alternative (C)." When comparing (B), (C) and (D) in the subsequent maps, the preferred alternative reveals development and use proposals nearly, if not identical to those in (C) in 9 of the 13 frontcountry zones, with significantly more development than (B). "Slightly" more or less is clearly an understatement. Accommodating visitor use, as a priority, should not be a focal goal that overrides wilderness protection. If use expansion persists, as outlined in the preferred, the very wilderness we are protecting will continue to shrink. While we appreciate accommodating all types of users, CNW would like to reiterate the growing concern that current population growth has already placed significant pressures on wildlife regimes around the world. What remains in our extraordinary park is rare and vital to its continued, intact existence.

Furthermore, increases in visitor use and road construction throughout the park over forthcoming years will exacerbate current hydrologic problems. Considerable research on the impacts of forest roads advises decommissioning problematic sections (see Redwood National Park for guidance). Many of the valley floors within ONP are flood plains that already encounter geomorphic changes, including network extension and increased peak flow, due to road construction in higher elevations. We would like to reaffirm what hydrologic research suggests and ask you to include considerations for decommissioning where washout problems persist.

Finally, we feel the draft plan lacks the opportunity to address a number of larger issues that would insure sound ecosystem management in the face of an uncertain future. We ask park planners to reconsider these recommendations, many of which are outlined in OPA's 2001 scoping letter, for inclusion in the final GMP.

- An ecosystem study from which to base critical resource management decisions,
- a recommendation to reintroduce wolves and the fisher into the Olympic National Park,
- a plan to address and eradicate invasive and non-native species, not just discuss their occurrence within the park,
- provide wild and scenic river recommendations for at least 12 park rivers that qualify for congressional designation, and
- a wilderness management plan that will address numerous controversial decisions regarding wilderness management in light of requirements of the Wilderness Act.

While the DEIS presents substantial discussion of the necessary balance between natural preservation and human use, we find that the dialogue does not actually support an equilibrium. Significant use expansion proposals and focus on cultural concerns consistently override natural resource protection in several arenas. Our national park, one worldly considered a biosphere reserve, should put forth its greatest efforts to protect the very nature of its existence. As we all know, it is much easier to be cautious than to attempt to revert to original conditions. Therefore, it is imperative that we collaborate to provide this region with the utmost respect and defense, especially as external forces continue to pressure its few-remaining, pristine qualities.

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Board President Alexandra Loeb
Board Vice-President Bill Donnelly
Board Secretary Jeffrey J. Bodé
Board Treasurer Tom Campion
Executive Director Mitch Friedman

We provide the aforementioned suggestions and concerns in hopes that wildlife and wilderness protection will continue to be the chief goal for Olympic National Park. CNW would like to see a final GMP with clear guidance, that is well balanced and reasonable, and provides these spectacular ecosystems with the protections necessary to insure a healthy environment; one which will endure the challenges of the coming decades.

Sincerely,

Alisyn Maggiora, Forestry Coalition
Derek Churchill, M.S. Forestry

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Comment 255-Evergreen Packgoat Club

PEPC 190683 ✓ -255

Olympic National Park
Draft General Management Plan

Summer 2006

National Park Service
U.S. Department of the Interior



COMMENT SHEET ONP - GMP

We welcome your comments on this project. The comment period closes on **09/30/2006**. Your comments must be delivered or postmarked no later than **09/30/2006**.

You may complete this form and provide it to the NPS at one of the open houses, or you may send this form and/or your letter to:

National Park Service
Denver Service Center - Cliff Hawkes, DSC-P
12795 West Alameda Parkway
PO Box 25267
Denver, CO 80225-9901

It is the practice of the NPS to make comments, including names, home addresses, home phone numbers, and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives of or officials of organizations or businesses, available for public inspection in their entirety

Personal Information

First Name: James Bennett

Middle Initial F.

Last Name:

Organization: Evergreen Packgoat Club, North American Packgoat association

Address 1: 14717 Purdy Dr. N.W.

Address 2:

City: Gig Harbor

State/Province Wa

Postal Code: 98332

E-mail: WethersFieldPackgoats@Comcast.NET

Keep my contact information private. Provide justification:

Please use below and the back of the paper for your comments. Attach extra sheets as necessary. Please print or write clearly.

although I think my comments are more appropriate for the wilderness management plan. I would like to propose to the ONP the opening of the ONP packstock trails to packgoat use.

Our organization includes people who have used horses and/or llamas for packstock what people find with goats is that they are friendlier, they carry up to 30% of their body weight, and are very low impact on trails. In addition to recreational packing, goats have been used by the U.S. Forest Service, Bureau of Land Management and State Wildlife and Fish agencies where access is very difficult or where resource damage by traditional packstock is a concern. It is highly likely that the National Park Service Policy

190683 pg 2

will be listing goats as acceptable packstock, for backcountry use.

The main point is that packgoats are very low impact animals compared to other packstock such as other stock like horses or mules that are already allowed in the Park.

Goats used as packstock are predominately wethers (neutered males) and does. Bucks (intact males) do not pack, can not and will not pack, no one packs with bucks thus making it impossible to create any kind of feral population. Many of us have been packing with goats in the Olympic National Forest for years. If there was a problem with feral populations arising from the use of packgoats the OMP would have seen some sign by now. There is no such problem.

Also contrary to most beliefs most goats don't stink only bucks do, and since no one packs with bucks, there is no problem with goats drawing in predators etc. wethers and does actually have less of an odor than do horses or llamas.

Thank you for your time and ~~and~~ consideration.

Jim Bennett

Evergreen Packgoat Club

Comment 25-Forks Chamber of Commerce

FORKS

25- PEPC 188464 PEPC ✓

Olympic National Park
Draft General Management Plan

Summer 2006

National Park Service
U.S. Department of the Interior



COMMENT SHEET ONP - GMP

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PO Box 25287
Denver, CO 80225-9901

It is the practice of the NPS to make comments, including names, home addresses, home phone numbers, and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives of or officials of organizations or businesses, available for public inspection in their entirety

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Last Name: BINGHAM L
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Keep my contact information private. Provide justification:

Please use below and the back of the paper for your comments. Attach extra sheets as necessary. Please print or write clearly.

"Boundary adjustment is a clear euphemism for land acquisition. Whether by condemnation or sale, I am opposed to GMP requiring any more land waters & united current lands can be inventoried, secured, and where appropriate, made available to more of the public. Good features and wilderness values are in the minority; this must be the park is inaccessible and I am opposed to this.

Comment 315–Friends of Miller Peninsula State Park

190792 -315

September 19, 2006
Olympic National Park Draft GMP
Denver Service Center
P.O. Box 25287
Denver, CO 80225
olym_gmp@nps.gov

RECEIVED

OCT - 4 2006

DSC-P

To: Park Planners

Friends of Miller Peninsula State Park was established in the early 1990s to protect the natural ecosystem of 3000 acres of State Park undeveloped lands near Sequim, Washington. Our goal is to promote the preservation of wild lands within the State Park system as much as is possible within the State's planning process.

We applaud the National Park plan to responsibly manage Olympic lands for future decades, but am uncomfortable that the planning alternatives are presented without the completion of a comprehensive wilderness plan. Several controversial issues are difficult to respond to without a wilderness management plan.

Recent discussion of restoration of extirpated species has been encouraging. We would like to see Park planners emphasize efforts to restore carnivores, like the fisher, and eventually the wolf. Such efforts would be very positive in an effort to rejuvenate the integrity of the Park's natural ecosystem.

Salmon are perhaps the most essential element of any restoration project. For this reason, we urge the park to recommend eligible rivers for Wild and Scenic river designation. This would strengthen Alternative B – specifically, by adding river protection zones.

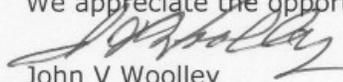
Expanding the Park boundaries is critical. Park planner recommended actions should include complete watersheds, as much as possible, within the five areas: Ozette Lake, Lake Crescent, and the Queets, Quinault, and Hoh river systems.

Please do not expand developed areas or developed zones. All proposed recreational and private developments should not be located on Park lands. They should be outside the National Park.

We applaud the Park Service for recommending wilderness study for Ozette Lake, and for progressive idea of establishing Olympic Coast intertidal reserves.

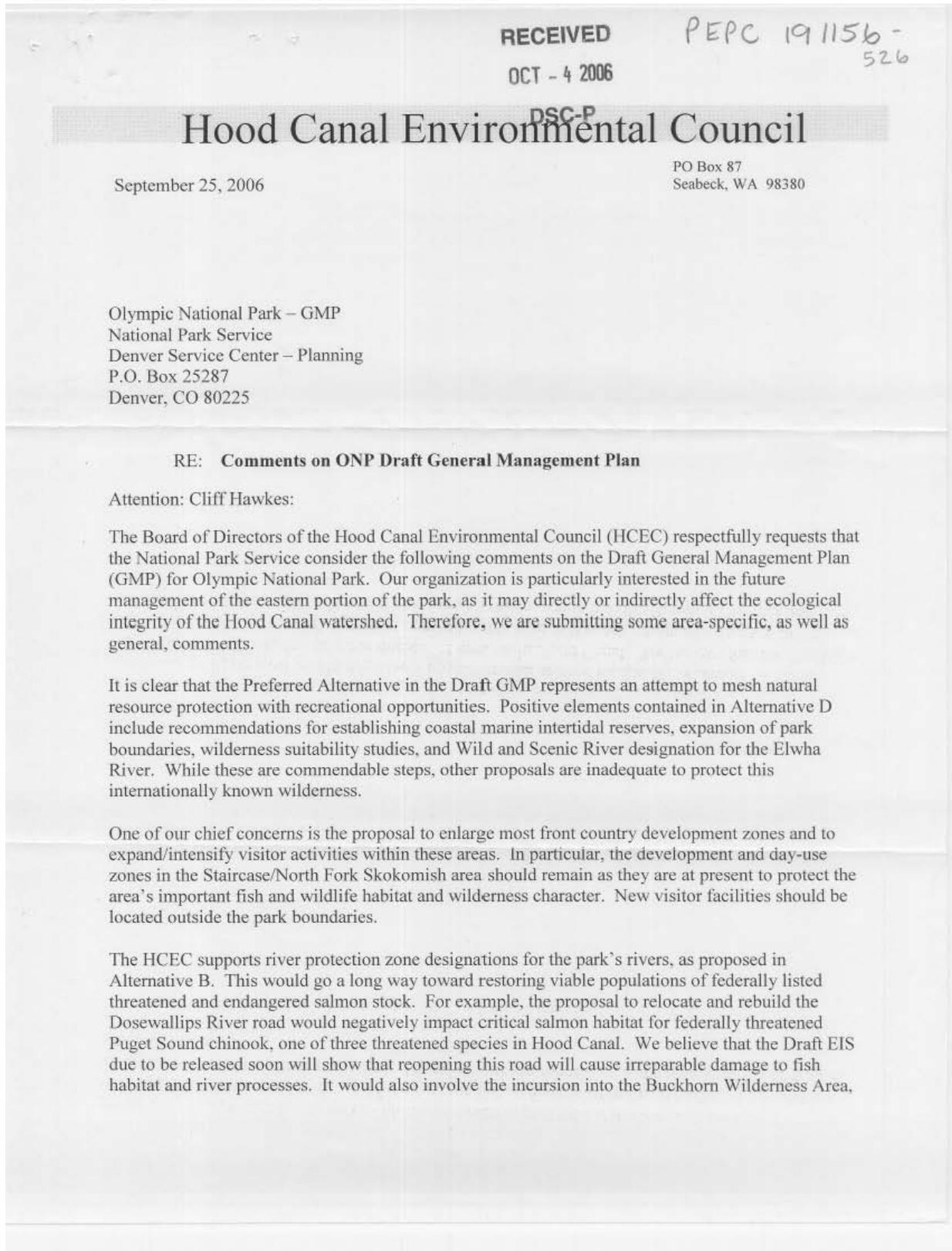
The Olympic is a world heritage Park. Alternative D falls short in recognizing this, because of its focus on motorized use and development. More emphasis should be on preserving ecological integrity. The GMP draft is a good start.

We appreciate the opportunity to comment.



John V Woolley
Friends of Miller Peninsula State Park
1606 E Sequim Bay Rd
Sequim, WA 98382

Comment 526–Hood Canal Environmental Council



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PEPC 191156 - 526

OCT - 4 2006

Hood Canal Environmental Council

DSC-P

September 25, 2006

PO Box 87
Seabeck, WA 98380

Olympic National Park – GMP
National Park Service
Denver Service Center – Planning
P.O. Box 25287
Denver, CO 80225

RE: Comments on ONP Draft General Management Plan

Attention: Cliff Hawkes:

The Board of Directors of the Hood Canal Environmental Council (HCEC) respectfully requests that the National Park Service consider the following comments on the Draft General Management Plan (GMP) for Olympic National Park. Our organization is particularly interested in the future management of the eastern portion of the park, as it may directly or indirectly affect the ecological integrity of the Hood Canal watershed. Therefore, we are submitting some area-specific, as well as general, comments.

It is clear that the Preferred Alternative in the Draft GMP represents an attempt to mesh natural resource protection with recreational opportunities. Positive elements contained in Alternative D include recommendations for establishing coastal marine intertidal reserves, expansion of park boundaries, wilderness suitability studies, and Wild and Scenic River designation for the Elwha River. While these are commendable steps, other proposals are inadequate to protect this internationally known wilderness.

One of our chief concerns is the proposal to enlarge most front country development zones and to expand/intensify visitor activities within these areas. In particular, the development and day-use zones in the Staircase/North Fork Skokomish area should remain as they are at present to protect the area's important fish and wildlife habitat and wilderness character. New visitor facilities should be located outside the park boundaries.

The HCEC supports river protection zone designations for the park's rivers, as proposed in Alternative B. This would go a long way toward restoring viable populations of federally listed threatened and endangered salmon stock. For example, the proposal to relocate and rebuild the Dosewallips River road would negatively impact critical salmon habitat for federally threatened Puget Sound chinook, one of three threatened species in Hood Canal. We believe that the Draft EIS due to be released soon will show that reopening this road will cause irreparable damage to fish habitat and river processes. It would also involve the incursion into the Buckhorn Wilderness Area,

in direct violation of the Northwest Forest Plan. In addition to river protection zone designations, we fully support Wild and Scenic river designation for the other twelve eligible rivers, including those on the park's eastside.

We strongly object to the proposal to designate use levels of wilderness areas without providing specific reasons. All wilderness-related decisions should be deferred until a comprehensive wilderness management plan is completed.

The Draft is also notable for its omissions. One is the absence of a recommendation to reintroduce extirpated species back into the park. We strongly urge the National Park Service to include a proposal to bring the wolf and fisher back into the Olympic National Park in an effort to bring about a more balanced ecosystem. We request that a wilderness management plan and ecosystem study be prepared, as requested by the Olympic Park Associates and other organizations.

We appreciate the opportunity to comment on this very important matter and to participate in the decision-making process.

Sincerely,



Bill Matchett, President
Hood Canal Environmental Council

Comment 503–Howard County Bird Club

PEPC 191021-503

HOWARD COUNTY BIRD CLUB

9045 Dunloggin Court
Ellicott City, Maryland 21042
krschwal@comcast.net

September 29, 2006

Olympic National Park General Management Plan
NPS, Denver Service Center
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Denver, CO 80225
olym_gmp@nps.gov

To the National Park Service:

The Howard County Bird Club appreciates the opportunity to submit the following comments on the draft General Management Plan for Olympic National Park. Members of the Howard County Bird Club have visited Olympic, as it contains important habitat for birds and other forms of wildlife.

The value of Olympic National Park to the nation is never clearer than at the park boundary, where the devastated, clearcut lands outside the park remind us what would have happened to the whole Olympic landscape, had the park not been established. Our members have witnessed this devastation outside the park. Hence, we believe that protection and restoration of the lands within the park should be the highest priority in this General Management Plan.

The Howard County Bird Club is an organization with a membership of more than 200 families and individuals in Howard County, Maryland. We are a chapter of the Maryland Ornithological Society, a nonprofit, statewide organization of people who are interested in birds and nature. Our purposes include promoting the study and enjoyment of birds, promoting knowledge about our natural resources, and fostering their appreciation and conservation. We offer field trips, bird counts, and conservation projects. The club has raised and donated over \$50,000 for wildlife habitat preservation during the past 25 years. Our members travel all over the United States to visit national parks and other federal lands on birding and nature-watching vacations. We spend dollars on food, lodging, guide services, books, and souvenirs to support the local economy wherever we go. Birding is one of the fastest-growing outdoor sports.

Wildlife Values

Olympic National Park is well known for its great diversity of wildlife habitats, from Pacific coastal waters to high mountain peaks. Over 300 species of birds and 70 species of mammals have been recorded in the park, including 18 endemics. UNESCO has designated the park as an International Biosphere Reserve and as a World Heritage Site. The American Bird Conservancy has identified Olympic National Park as a Globally Important Bird Area, and Peter W. Thayer lists it as one of the top 100 North American birding hot spots.

To make the most of wildlife values in Olympic, we urge the National Park Service to emphasize the restoration and protection of the natural ecosystem of the Olympics. This

park may be the best opportunity in the lower 48 states to have a complete, intact ecosystem functioning naturally. The preferred alternative (Alternative D) misses several opportunities to restore and protect the ecosystem, as we will point out below. We favor the reintroduction of the fisher and wolf in Olympic and more vigorous efforts to restore the degraded rivers.

Development Zones

We support the measure in Alternative D to introduce voluntary public transportation in congested traffic areas of Olympic park. Comparable systems of shuttle buses or snow coaches are in use at Yosemite (3 locations: Yosemite Valley, Wawona, and Tuolumne Meadows), Yellowstone, Grand Canyon south rim (4 routes), Zion, Bryce Canyon, and Harpers Ferry. They enable visitors to avoid the hassle of traffic jams and the search for a parking spot. They could be a great improvement on conditions at Hurricane Ridge (snow coaches in winter, Obstruction Point shuttle in summer), Sol Duc Hot Springs, and Hoh River Rain Forest, and they would head off greater traffic problems in the future.

We oppose the expanded development zones proposed in Alternative D at Hurricane Ridge, Sol Duc Hot Springs, and Elwha River – all key visitor-use areas accessible by roads. Hurricane Ridge is where most visitors experience the high mountains and observe the birds, mammals and plants found there. It is in the sub-alpine zone, where the meadows and fir forests intermingle, and where buildings and roads can only mar the landscape. Please keep Hurricane Ridge natural, and use the existing road, visitor center and concession building as the only intrusions. At Sol Duc and Elwha, the scarce, low-elevation floodplain lands bearing old growth forest are a treasure for visitors, a wild setting that is readily accessible for bird-watching and easy hiking. Expansion of buildings and facilities there should be avoided. The gateway communities outside the park are already providing lodgings and campgrounds to serve park visitors and should be encouraged to expand those businesses to meet growing demand, without imposing any impacts on these key areas of the park.

Wilderness Areas

Olympic is fortunate that some 95 percent of the park has already designated as wilderness by Congress. We favor wilderness studies for Ozette Lake, Pyramid Peak ridge north of Lake Crescent, and the boundary additions including Ozette Lake, so these areas can receive consideration for protection as wilderness.

Alternative D contemplates maintaining or rehabilitating up to 50 structures and altered landscapes in the wilderness areas of the park, on grounds they are “historic.” The existence of old buildings does not mean that they are automatically historic structures that must be maintained. Here in our region, Shenandoah National Park has several areas designated by Congress as wilderness, and we know of only one cabin maintained in them (the historic Corbin cabin). Many decaying remnants of old cabins can be seen in the Shenandoah wilderness areas, dating from the years when these mountains were settled and farmed. The Shenandoah example should inform your decision for Olympic.

We question the partition of Olympic wilderness into three zones (Primeval Zone, Primitive Zone, and Wilderness Trail Zone). The Wilderness Act does not call for any such zones. The zones could imply that some parts of the wilderness will be less protected than others. Some of the facilities mentioned in the DEIS appear inconsistent

with the Wilderness Act. We urge NPS to resolve this and other issues of wilderness stewardship in a wilderness management plan.

Boundary Additions

We favor the boundary additions described in Alternative B, in which lands essential for park purposes would be added around Ozette Lake following the hydrographic divide, north of Lake Crescent in the Lyre River and Boundary Creek watersheds, and on the Hoh, Queets and Quinault Rivers. All these additions will yield important benefits for wildlife values, including fish spawning waters, lowland elk habitat, and many species of birds associated with those habitats. The reduced additions in Alternative D would leave parts of the watersheds open to logging, with resultant impacts on the downstream lands inside the park.

Rivers and Coastline

The ecological health of the 13 rivers in Olympic National Park is important to visitors who go there to observe nature. The rivers should receive more protection in the plan. We favor the “river protection zones” proposed in Alternative B, to give higher priority to restoration of natural riparian and aquatic ecosystems, the native runs of salmon and steelhead, and the birds and mammals that are part of those ecosystems. The “armoring” of river banks and channelization (as at Finley Creek) work against naturally functioning ecosystems.

We urge NPS to carry through with studies of all 13 rivers under the Wild and Scenic Rivers Act, instead of only the Elwha. It is now 38 years since the WSR Act became law, and it is high time the rivers of the Olympic Range were given the consideration and protection they deserve.

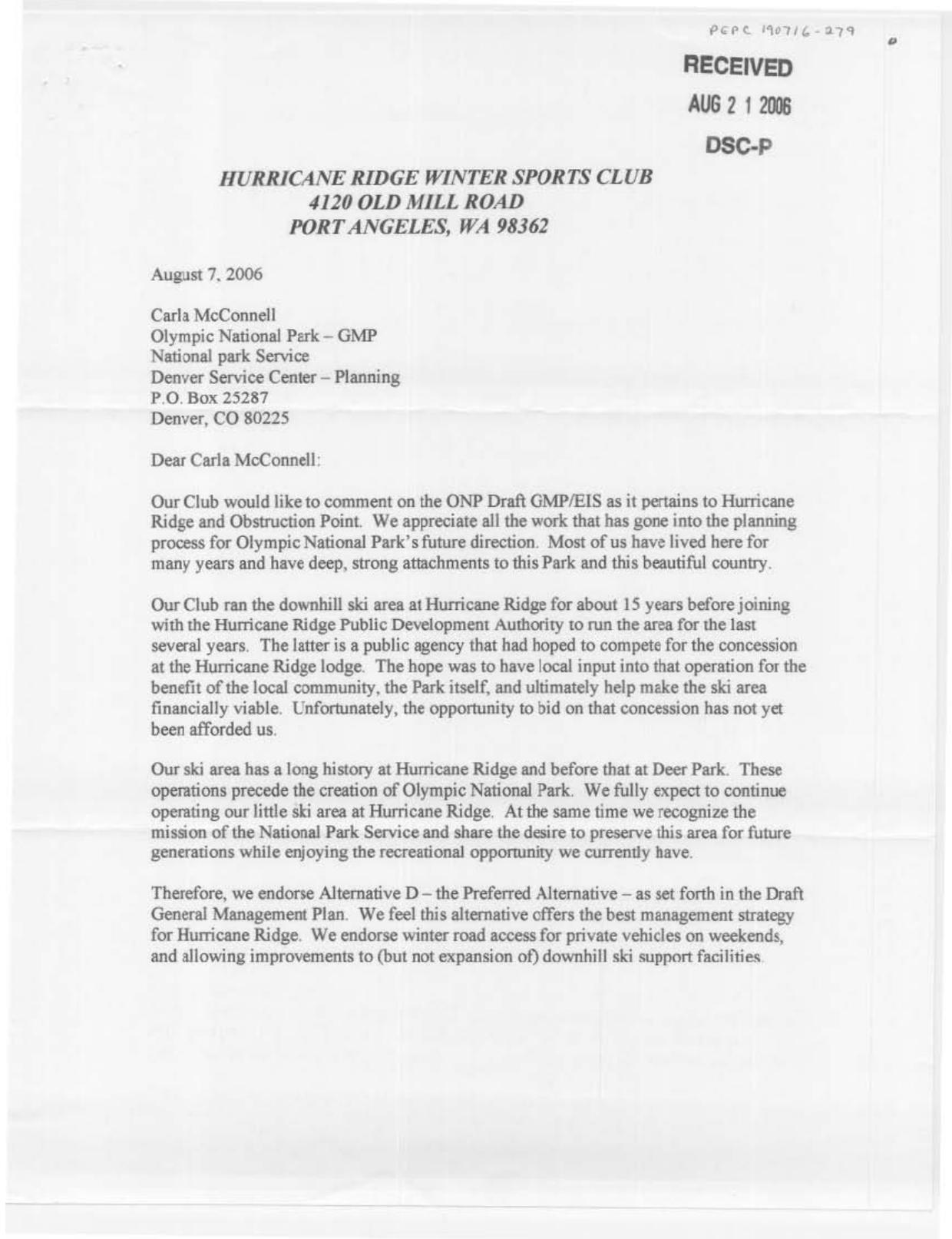
We favor the “intertidal reserves” proposed in Alternative D for the Olympic coast. The intertidal habitat is essential for birds, as the invertebrates found there are a vital food source for migrating shorebirds as well as resident species. The intertidal reserves would fill a gap in protection between the Marine Sanctuary and the protected landscape above high tide.

Thank you for the opportunity to submit these comments.

Sincerely,

Kurt R. Schwarz
Conservation Chair

Comment 279-Hurricane Ridge Winter Sports Club



Olympic is a very special place and we appreciate the stewardship provided by the National Park Service. We hope to continue our mutually beneficial relationship.

Sincerely yours,



Roger M. Oakes, President
Hurricane Ridge Winter Sports Club

CC: Board Members
Mr. Steve Oliver, President, HRPDA

Comment 563-Juan de Fuca Scenic Byway Association

Juan de Fuca Scenic Byway Association
Strait of Juan de Fuca Highway SR112
A National Scenic Byway
P.O. Box 188
Joyce, Washington 98343

PEPC 191200 -
563

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OCT - 4 2006
DSC-P

Carla McConnell
Olympic National Park – GMP
National Park Service
Denver Service Center - Planning
P.O. Box 25287
Denver, CO 80225

September 28, 2006

Dear Ms. McConnell,

Thank you for an opportunity to comment on the Draft General Management Plan for Olympic National Park.

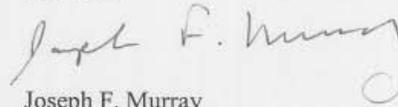
Several members of the Juan de Fuca Scenic Byway Association attended open houses sponsored by the Olympic National Park. The Park staff was on hand to inform the public of their plans. Comments were accepted in writing and by taped recordings. It was unfortunate that an open public forum at which local citizens could speak was not allowed, because the passion of an individual's position was lost to the Park as well as to the other participants.

"However, the four county region is not affected due to the size and diversity of the regional economy." This conclusion is stated in the section "Local Economies" under the part of the document titled "Impacts to the Socioeconomic Environment." This seems to show the Park's lack of understanding of our local economies. The local economy in the Clallam Bay/Seki area and other parts of the Western Olympic Peninsula, essentially the economy on the West End is driven by natural resources and tourism. The East side of Olympic National Park has larger more diversified economies in the urban areas. Most of commercial forest land that would become part of the Park is on the west side of the Peninsula, this will cost direct job loss to those employed in the forest as well as in the communities supported by the forest. Your preferred 'Alternative D' will cost our community jobs which are essential to our socioeconomic environment.

Reducing motorized boating would reduce local and tourist use of the Ozette Lake and corresponding economic activity. This is yet another example where the Park has overlooked the interests and economic well being of our West End communities. The Juan de Fuca Scenic Byway Association has a strong interest in keeping/maintaining existing recreational opportunities for both local residents and travelers. Outdoor recreation is a major element in the area's quality of life and a draw for tourism.

Perhaps these comments will inspire the Park to reassess their beliefs about the West End and develop an understanding of the people who live and work in the area. The Park provides numerous public presentations, solicits written and taped comments, and goes to great lengths to include this input in publications to document the public process. It is unclear; however, to what extent this solicited input influences park policies. We would recommend that the Park take a less imperial approach and talk with the people, not at them. Olympic National Park should develop a plan around 'Alternative A' which allows for the maintenance of existing park lands, roads and developed areas. This will help move the community's interaction with the Park from one where the Park draws conclusions prior to asking for input to one where the Park consults with the community to develop balanced solutions.

Sincerely,



Joseph F. Murray
President

Juan de Fuca Scenic Byway Association

Comment 262-Llama Ladies

PEPC 190698-262 ✓

**Olympic National Park
Draft General Management Plan**

Summer 2006

National Park Service
U.S. Department of the Interior



COMMENT SHEET ONP - GMP

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12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225-9901

It is the practice of the NPS to make comments, including names, home addresses, home phone numbers, and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives of or officials of organizations or businesses, available for public inspection in their entirety

Personal Information

First Name: Dee Middle Initial G,
 Last Name: Christensen
 Organization: LLAMA LADIES
 Address 1: 656 Sutter RD
 Address 2:
 City: Port Angeles State/ Province WA
 Postal Code: 98362

E-mail: johndee@olympen.com

Keep my contact information private. Provide justification:

Please use below and the back of the paper for your comments. Attach extra sheets as necessary. Please print or write clearly.

1. Wilderness Area - keep open trails, bridges, campsite for hikers & stock.
2. OPTION IN PLAN TO PARTNER WITH NPS & TRIBES TO access trails into areas that cross both boundaries
3. Areas now accessible to public should be enhanced - ie Hurricane Ridge, Deer Park, Marmose etc. PLANIC preferred
4. Better trail to SITT SHI BEACH After Makah Reservation trail ends -

5. Sol Duc Hot Springs - keep open !!
Important tourist destination and popular
local use -

6. Overall statement:

Plan D - prefer for all wilderness
areas

Plan C - prefer for already easily
accessible use - older generation,
children, physically impaired

Other members present today

JAN HURWORTH

Ann Butler

Debbie Simers -

Comment 458-The Mountaineers

YEP 190956-458



Founded in 1906
to Explore,
Study, Preserve,
and Enjoy the
Natural Beauty
of the Outdoors

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OCT - 2 2006

DSC-P

September 28, 2006

Olympic National Park
National Park Service
Denver Service Center
P.O. Box 25287
Denver, Colorado 80225

RE: Draft Olympic National Park General Management Plan

Dear National Park Service Administrator:

The Mountaineers, with over 10,700 members, is one of the premier outdoor recreation and conservation organizations in the Northwest. We actively pursue mountain-based recreation in the Northwest, and are equally fervent about the conservation of our natural resources. We therefore care deeply about the future of Olympic National Park (ONP) and wish to submit the following comments regarding the draft General Management Plan for ONP. Please consider our comments carefully as you revise the draft plan.

Our members have explored the Olympic peninsula since the club's founding in 1906, and we have been deeply involved in deliberations about management of ONP for many years. We worked to establish the National Monument that preceded the park's creation, and our interest, along with that of other conservation organizations, has focused on opposition to reducing the size of the park and to creating or maintaining roads that would despoil wilderness. We have also actively supported additions to the park that would further enhance wildlife habitat while increasing recreation opportunities in an ecologically responsible way. We also protested the proposed land deletions in the 1940's and 50's that would have allowed cutting in the Sol Duc and Quinault forests, and illegal "salvage logging" in the 1950's proposed under the guise of public safety. We opposed the removal of the private lands in the Lake Quinault area of the park that now provide valuable elk habitat, and supported the additions of the Queets, Ocean Strip, and Shi Shi areas to the park. We also protested the "ocean highway" proposals in the 1950's and 60's, and continue to encourage the removal of the non-native goats that have no natural enemies and seriously degrade the mountain meadows.

We stress these past activities to emphasize the Mountaineers extensive interest in maintaining and enhancing the wilderness character of ONP and to establish the basis of our following specific comments, all of which focus on our sense of serious threats to the Park's wilderness character contained in the draft management plan. We must express our disappointment that a long overdue Wilderness Management Plan is not adequately addressed within this management plan. In fact, we find several instances where the Park's wilderness is jeopardized by recommendations within the preferred alternative.

ONP General Management Plan comments
Conservation Executive Committee, The Mountaineers

Headquarters:
(206) 284-6310
300 Third Ave West
Seattle, WA 98119
Fax (206) 284-4977



Without a comprehensive wilderness plan, the General Management Plan cannot be complete or true to the enabling legislation of the Park or the Federal Wilderness Act. We wish to remind you that the Park was established to protect the grandeur of the Olympic Mountains; portions of the ancient forests that reach from sea level to the mountain valleys; the rivers that flow from their glaciers and snowfields; and the great variety of wildlife whose home is this magnificent Park. ONP is a substantial portion of the Olympic Peninsula's ecosystem and an important Washington State natural resource for fish, wildlife, clean water, clean air, and responsible recreation. We believe that a management plan should be adopted that emphasizes, rather than jeopardizes, the essential wilderness character of the Park, and we therefore wish to make the following specific points based on this belief.

1) The preferred alternative does not guarantee sound wilderness management. It places far too much emphasis on the preservation and rehabilitation of dozens of structures built in the 30's & 40's that today are not needed by visitors or for the administration of the wilderness areas where these structures stand. Despite the management plan's contention that historic structures of all types "enhance wilderness character," this claim has been refuted in several successful federal lawsuits. The latest case was the attempt to place two "historic" shelters in the backcountry wilderness. According to the Historic Preservation Act, historic structures, especially those that can be found or replicated elsewhere, do *not* have to be maintained in place. Further, the introduction or maintenance of such structures violates provisions of the Wilderness Act.

2) The preferred alternative suggests that wilderness boundaries should be changed to permit relocating roads in river flood plains. Roads in flood plains are not only costly to maintain but also the frequent washouts and subsequent rebuilding of roads damage precisely the fish and wildlife habitat that the Park should be protecting. We thus definitely oppose changing wilderness boundaries for the sake of activities that violate the very wilderness that the Park is supposed to maintain! For example, as we learned from the washout on the Queets River, access to the Queets can be adequately obtained from Forest Service and Washington Department of Natural Resources roads. The first consideration for maintaining roads in floodplains should be resource preservation, not access. The Dosewallips River road is a further example of attempts to restore a road to the detriment of nature. Restoring the Dosewallips would remove huge old-growth trees, damage bird and fish habitat, and place the road on a hillside that would almost certainly wash out later while intruding on the wilderness character of the Buckhorn Wilderness. While the latest washout is on Forest Service land, and affects access to the Park's Dosewallips campground, we argue strongly that decisions such as these should emphasize maintaining wilderness and preserving wildlife habitat, not human access to trails or campgrounds. The National Park Service should be sensitive to these issues and support the best actions necessary to preserve the wildlife in and around the Park.

The Mountaineers is against the reestablishment of road corridors, whether within the flood plain or in the forested uplands, that are negatively impact these resources and that requires Congressional authorization of altering wilderness boundaries. The ONP General Management Plan should adopt a roads network management policy that decommissions those roads, not rebuilding them.

ONP General Management Plan comments
Conservation Executive Committee, The Mountaineers

3) Maintaining the Park according to the Wilderness Act of 1964 provides outstanding management guidelines for a park that has been essentially designated as wilderness under this Act. It reduces the need for maintenance of buildings and roads and the resulting costs. Precious resources can be best used for trail maintenance, scientific research, and visitor interpretation. Wilderness national parks should not replicate city parks, state parks, recreational areas, or amusement parks on a grander scale. They are places where humans visit and leave no trace. Facilities needed for human comfort that cannot be carried on one's back should be located outside a de-facto and de-jure wilderness park.

Attempts to zone wilderness have no factual basis in the Wilderness Act and should never be used in a wilderness plan or for management of any wilderness areas of the Park. Removal of vegetation around "historical" buildings in wilderness to protect the structure from fire only degrades the wilderness in order to preserve a structure within wilderness in the event of fire. As we state above, the main priority of ONP management should be maintaining the Park's essential wilderness qualities, not unnecessary and intrusive structures.

4) Large concentrations of developed campsites even near the Park's entrances would inevitably degrade the wilderness, diminish wildlife habitat, and stress the surrounding landscape. Large campgrounds, especially approaching 250 campsites, would increase tensions among visitors, increase the need for law enforcement, disrupt wildlife, and cause large areas of vegetation to be trampled. Tourist concentrations should be provided in the communities surrounding the park, not within the Park's de-facto wilderness.

5) The Mountaineers support the Park's rivers being kept wild for fish and wildlife enhancement. We oppose rebuilding or repairing roads that damage the riparian areas. We strongly support the protective "river zones" as displayed in Alternative B. The rivers are vital as wildlife habitat, both for the fish within them and also for the other natural processes that depend on the river system. A natural Northwest forest depends on the salmon that return to spawn and a biological system that allows spawned carcasses to be left in the river to feed their offspring and other wildlife that, in turn, feed the surrounding plants and trees. Impediments to this process degrade the natural process of the whole riparian system. Regarding specific river systems, we prefer that ways be found to solve the stone accumulation problem at the bridge on Finley Creek other than the annual bulldozer removal. We agree with the proposal to designate the Elwha River as a Wild and Scenic River and believe that all the rivers within the Park should be included in the Wild and Scenic River System.

The club also agrees with the proposed addition of the Ozette Lake river system to the Park. This addition would protect fish and wildlife, and protect the Lake Ozette basin from pollution and siltation created by logging, road building, and other commercial activities. We wish to remind you that the Ozette Lake sockeye have been listed as a threatened species, and actions to secure this species' recovery are urgently needed.

ONP General Management Plan comments
Conservation Executive Committee, The Mountaineers

We support adding needed elk habitat in the Lake Crescent area. We further support the recommend additions to the Queets River corridor and habitat additions in the Hoh and Quinault river systems.

However, the preferred alternative park expansions do not always conform to natural watershed boundaries. As a result, these expansions do not do enough to protect our valuable salmon and wildlife by preserving river habitat and preventing activities that pollute and silt fish spawning and feeding areas within the rivers. We do support the land additions as displayed in Alternative B. We further advocate that more resources be used to protect salmon and other fish species for the enrichment of the Park and the entire Olympic Peninsula ONP is a magnificent example of a natural ecosystem, and we therefore encourage the expansion of educational and interpretive programs to better educate the public about the interrelationships of land, plants, animals, and water in such a large and critical ecosystem.

6) We strongly urge that the Park's administration begin immediately restoring wolves in the park as they have done for the fisher. We also wish to emphasize that the Olympic Elk were specifically named as a reason for initially establishing ONP, and we are concerned that park roads are providing access for elk poachers. We therefore oppose adding roads that would facilitate poaching and ask for greater surveillance to stop this activity. We also wish to add that maintaining the elk herds would provide a natural prey for wolves, and thus minimizing poaching would contribute to a natural balance between wolves and elk within the Park.

7) To help preserve these natural systems we encourage the use of bus systems in heavily used and developed areas of the Park. Encouraging bus systems could reduce law enforcement problems and poaching, and limit damage to heavily used areas. We also support the development of short, all-accessible loop trails in the Park's front country. These trails could support the educational and interpretive programs that should be available to visitors, exposing them to the Park's many wonders.

Given these specific points, the Mountaineers believe that finalization of the General Management Plan should occur only *after* the development and subsequent public review of an extensive and well coordinated wilderness plan for ONP. Given the essential wilderness character of most of the Park, we believe strongly that the main goal of any new management plan for ONP must emphasize maintaining the wild character of one of the nation's most magnificent national parks.

In summary, the General Management Plan should:

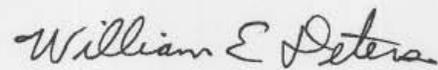
- Prioritize the preservation of ONP's natural systems, restoring threatened wildlife, and protecting the integrity of its world-class wilderness as the highest priority;
- Expand park boundaries in five areas (Ozette Lake, Lake Crescent, the Hoh, Queets and Quinault watersheds) to protect critical habitats for salmon and wildlife as proposed in Alternative B;
- Establish river protection zones to ensure that critical salmon habitats and natural river processes are preserved as proposed in Alternative B;

ONP General Management Plan comments
Conservation Executive Committee, The Mountaineers

- Recommend all 13 eligible rivers for federal Wild and Scenic River designation;
- Restore extirpated species like the wolf and fisher into the Park through a reintroduction program;
- Keep developed areas at their current size as described in Alternative A. New recreational developments are best located outside the ONP;
- Defer all related all decisions to wilderness until a comprehensive wilderness management plan is completed and available for public review;
- Establish intertidal preserves on the Park's wilderness coast to protect biologically rich marine areas;

The Mountaineers appreciates this opportunity to comment on the current draft management plan, and wishes to be kept informed of future development of this plan.

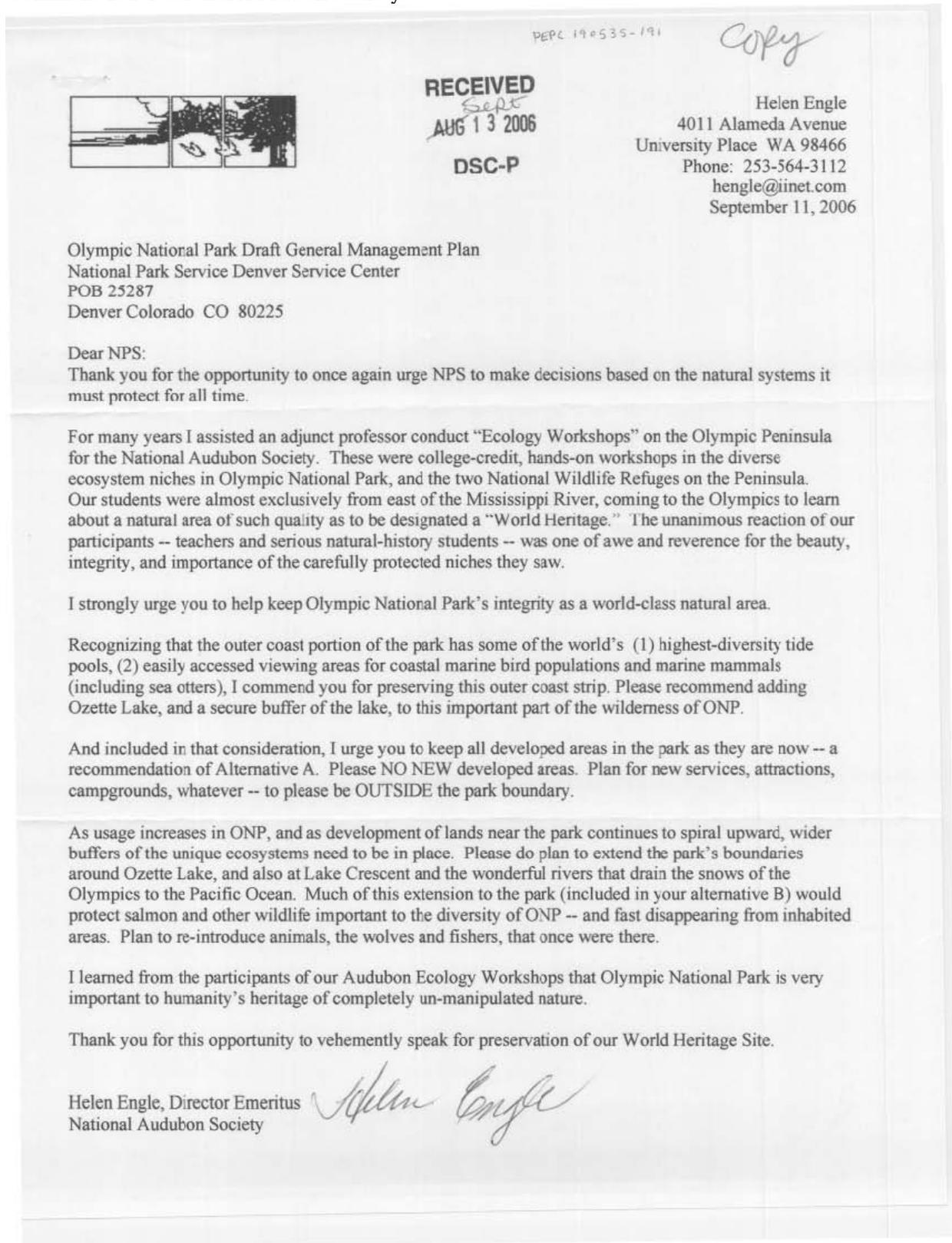
Sincerely,



William Deters, President

ONP General Management Plan comments
Conservation Executive Committee, The Mountaineers

Comment 191–National Audubon Society



Comment 505-National Outdoor Leadership School Pacific Northwest

PEPC 191023 - 505

September 29, 2006

Cliff Hawkes
Olympic National Park – GMP
National Park Service
Denver Service Center – Planning
P.O. Box 25287
Denver, CO 80225

RE: General Management Plan

The National Outdoor Leadership School (NOLS) submits this letter of comment on the Olympic National Park Draft General Management Plan (GMP). NOLS is a non-profit educational organization, teaching backcountry wilderness skills and leadership to students of all ages from five locations in the U.S. and four international schools. In the U.S., we are a fully permitted, fee-paying operator on public lands. **Holding 21 separate permits to teach students in national parks, we have a keen interest in the future of park system management** and a solid foundation of experience from which to provide comment.

NOLS appreciates the opportunity to provide input on the draft plan. Overall we **believe the preferred alternative provides an excellent balance between natural resource protection and improving visitor access.**

- NOLS is pleased overall that the GMP designates 3 wilderness zones, the majority of wilderness being designated as primeval. The zone designations are appropriate, and lay a foundation for the WMP. The details of how these areas end up managed under the WMP will be critical.
- NOLS is pleased that under the preferred alternative, 35% of the Park's coastal strip would be designated as intertidal reserves. Protection of these intertidal zones is critical to the health of the coastal ecosystem. Permit limits, especially in high use seasons, and designated trailways would be appropriate future steps as part of the GMP or WMP processes.
- NOLS is pleased that the GMP increases universal access and front country opportunities, including **a greater emphasis on educational and interpretive programs**. Improved and expanded visitor facilities will also greatly assist in this effort, and help improve the experience of the vast majority of the visitors who do not travel far from their vehicle. Improving their experience, and their knowledge of the Park, will help create more stewards and proponents for the Park's future. We trust that when visitor facilities are developed or improved, those buildings will be **built in as sustainable a manner as possible**.

- NOLS is very supportive of an increased **focus on mass transit** to reduce vehicle use in some areas, especially Hurricane Ridge. NOLS also supports the **maintenance of existing road access** to the Park. The GMP should ensure that trail access is maintained for a variety of user groups, and there should be no net loss of trail access to any group including hikers and stock. Stock use on Wilderness trails, where appropriate, should remain open to all stock users, not just to special permitted Park Service approved pack strings or saddle horses.

Our concerns:

- The draft GMP is not explicit about how it will tie in with the long delayed Olympic National Park Wilderness Management Plan. Given the fact that Olympic National Park is 95% designated wilderness, the details of how the two plans will work together is critical. The WMP must follow in a timely manner.
- The GMP mentions that wilderness campsites will generally remain the same, though some may be relocated, modified or restored. The GMP goes on to explain that some wilderness areas of the Park may have limits established on numbers of campers. NOLS understands that some limits may need to be placed on overall numbers of campers in certain areas in order to protect resources, but we would be concerned if that was done through limiting group sizes below the current level of 12.
- The GMP mandates the protection of all historical and cultural properties in wilderness without evaluating the impact on wilderness character. Historic shelters have been allowed to fall into disrepair. Many are on eyesore. Given the budget challenges the Park continues to face, NOLS recommends that many of these wilderness based structures be removed rather than spend money trying in maintenance.

We appreciate the opportunity to share our views and look forward to continuing to work with the NPS to introduce the public to a superlative park. We hope that our input is helpful. If you have any questions or need additional information, please contact me.

Sincerely,

Mark Langston, Operations Manager
NOLS Pacific Northwest
P.O. Box 527

Conway, WA 98238
360-445-6657

Comment 454–National Parks and Conservation Association

PEPC 190952 -
454

September 26, 2006

Superintendent Bill Laitner
Olympic National Park
Draft General Management Plan
Denver Service Center
P.O. Box 25287
Denver, CO 80225

RE: Comments on Olympic National Park’s Draft General Management Plan

Dear Superintendent Laitner:

The idea of the National Parks is powerful and touches upon universal themes, hopes and beliefs such as wilderness, union, and struggle. More than 200 nations have copied our model. Some say that the National Park idea is one of the greatest gifts America has given to world culture; the National Parks Conservation Association agrees.

Organic Act

“To conserve the scenery and the natural and historic objects and the wildlife therein, and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (Organic Act 16 USC sec 1).

In 1916 Congress passed the Organic Act. This Act contains the precedent setting idea that the United States would protect its nationally significant irreplaceable resources in a National Park System. Furthermore, the Act makes clear that one of the NPS highest priorities is to provide recreation opportunities, however that recreation is to be limited to those activities which leave the resources and values contained in the park system unimpaired for future generations. This is the filter that all NPS decisions must flow through regarding the Olympic National Park general management plan (GMP).

Greater Good Alternative

NPCA applauds the National Park Service’s (NPS) effort at Olympic National Park to create a uniform and modern plan. Because of the vast array of natural and cultural resources the NPS must protect and changes in technology and society’s needs, we are highly encouraged by the NPS effort to create a guide that reflects current trends and conditions. The NPS draft management plan is a significant step in achieving the NPS

mission; we offer the following suggestions to aid the NPS in preserving all the resources of Olympic National Park from impairment.

To that end, we support the **Greater Good Alternative** (Guarding Resources, Transportation, Gateway communities and recreation Opportunities for our Decedents). This alternative, among other things, calls upon the NPS to finalize a plan with suggestions as contained in our Olympic "State of the Parks Report." A copy of that report is included with our comments.

Specifically, we ask the NPS to:

- *Increase natural resource research and monitoring.*

Research projects should include post dam removal on the Elwha River, long-term monitoring of spotted owls, marbled murrelets, and Roosevelt elk. Studies should also focus on the impacts of adjacent land use.

- *Acquire lands and habitat critical to wildlife, recreation and cultural resources.*

NPCA is especially pleased to see the NPS' preferred alternative includes several boundary adjustments including areas around Lake Ozette, Lake Crescent and Queets. We specifically support the NPS' proposed plan to acquire an additional 44,000 acres of private forestland to exchange with the state of Washington for mineral rights within the park.

However, we also encourage the NPS to consider the additional boundary adjustments as contained in Alternative B. In particular, NPCA supports additional adjustments in the Hoh and the Quinault areas.

Federal investment in National Parks has a significant positive impact upon regional economies. According to a recent NPS study it's estimated that national parks generate nearly \$5 of economic benefit for every tax dollar invested in park budgets. At Olympic alone, federal investment results in more than \$100 million in benefit to gateway communities as well as supports nearly 2400 local jobs. See Appendix 2 for more on this impact.

- *Support the removal of mountain goats, as well as examine the reintroduction of extirpated species such as the fisher and wolf.*

Mountain Goats, a non-native species, are of particular concern in Olympic National Park. First introduced in the 1920's, the Mountain Goat population has been estimated to be as large as 1,100 animals. Recent estimates put the number at

between 230 and 325 goats. These animals can negatively impact native ecosystems through grazing, wallowing, trampling, and eroding soils.

NPCA is pleased to see the NPS is working with the US Forest Service, the state of Washington and several Indian tribes to improve techniques for estimating goat populations. We encourage the NPS to take the lessons learned from these efforts and immediately apply them to future goats counts.

According to the NPS' 2006 Management policies, Sec. 4.4.2.3 the Park Service will actively undertake efforts to restore listed native species. NPCA is also encouraged to see the NPS is already engaged in a process that might ultimately lead to the reintroduction of the Fisher, a small weasel-like animal that is extinct in Washington state. NPCA supports this process. See Appendix 3 for NPCA's comments on the draft Fisher plan.

In addition, we ask the NPS to begin a process to examine the reintroduction of the grey wolf to the Olympic peninsula. Wolves once roamed the Olympic peninsula but systematic hunting, trapping and poisoning eliminated them by the mid 1930's. Reintroduction of gray wolves has been suggested on at least four occasions since the 1930s. Most recently, a 1999 study found that the Olympic peninsula might be a suitable site for wolf reintroduction.

According to Defenders of Wildlife, there are significant ecological benefits to wolf reintroduction. Most notably, wolves provide a population check upon large ungulates such as deer, moose and elk. Moreover, wolf reintroduction has been shown to have positive economic benefits. According to John Duffield, an economics professor at the University of Montana, Yellowstone wolves generate roughly \$70 million in regional benefits. The Olympic Peninsula could expect similar benefits.

Some may oppose wolf reintroduction citing concerns such as human safety. However, the Oregon Wolf Advisory Committee states that while wolves can pose a threat to human safety "generally, attacks by wild wolves on humans are a rare event and fatal attacks are very unlikely." See Appendix 4 for more on wolves.

- *Increase the study of and planning for park cultural resources.*

In particular, NPCA encourages the NPS to complete an archaeological study to describe and evaluate the condition of 99 percent of the park's 622 identified sites; an update of the 1988 Archaeological Overview and Assessment; surveys and evaluations of historic archaeological resources, a historic preservation plan to address all structures in the park that are at least 40 years old; and an updated List of Classified Structures that includes all of the park's historic structures.

- *Create Intertidal Reserves*

Olympic National Park protects more than 65 miles of undeveloped Pacific Coast. The coast is a mixing zone of southern and northern Pacific intertidal species. Additional protection for this area was afforded through the establishment of the Olympic Coast National Marine Sanctuary in 1994. However, NPCA is concerned about linkages between intertidal and nearshore environments and habitat for special species like the northern sea otter. These concerns relate to erosion and increased sedimentation loads from the mainland on the nearshore environment, as well as the effects of potential over harvest of marine organisms.

The ecological and economic benefits of intertidal reserves and marine protected areas are numerous. According to Christy Bell of the University of Santa Cruz, intertidal areas provide unique research and teaching locations. These reserves can also produce economic benefits by better preventing fish population crashes that force broad closures.

In addition, intertidal reserves are likely to benefit marine mammals such as the Orca and Sea Otter, as well as shorebirds and other mammals like the black bear. Specifically, intertidal reserves can benefit these species by providing undisturbed habitat and food sources. Intertidal reserves also serve as an ideal “outdoor research lab” for studying the impact of activities such as shellfish harvest and predation upon near shore ecosystems. See Appendix 5 for more on these benefits.

As such, we urge the NPS’ to include intertidal reserves as called for in Alternative C in its final alternative.

- *River Protection Zones*

Olympic’s rivers and streams are critical components of a healthy park. NPCA asks the NPS to establish river protection zones as contained in Alternative B. These zones will best ensure that critical salmon habitats, natural river processes, recreational opportunities and economic benefits are protected. In addition, we urge the NPS to recommend that all 13 eligible park rivers be included within the federal Wild and Scenic River program.

- *Wilderness Designations*

NPCA is disappointed that the GMP does not include a comprehensive wilderness management plan. As such we ask the NPS to defer wilderness designations until a comprehensive wilderness management plan is completed.

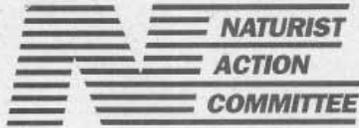
Conclusion

The Park Service's draft GMP for Olympic National Park is a significant step in the right direction. NPCA applauds the NPS for the time and energy that went into the drafting of this document. Yet, we urge the Park Service to adopt NPCA's "Greater Good" Alternative which calls for among other things: 1) increased natural resource research and monitoring; 2) adjustment of park boundaries to adequately protect resources, wildlife and gateway economies; and 3) creation of intertidal reserve zones.

Sincerely,

Sean Smith
Regional Director

Comment 353-Naturist Action Committee



PEPC 190832 - 353

RECEIVED

SEP 18 2006

DSC-P

P.O. Box 132 • Oshkosh, Wisconsin 54903 • (920) 426-5009 • Fax (920) 426-5184 • www.naturistsociety.com

Mark Storey
2142 N 147th Street
Shoreline, WA 98133
(206) 361-9428

September 14, 2006

Carla McConnell
Olympic National Park—GMP
National Park Service
Denver Services Center—Planning
PO Box 25287
Denver, Colorado 80225

Re: General Management Plan for Olympic National Park

Dear Ms. McConnell:

I appreciate the opportunity to offer public comment on a small portion of the General Management Plan for Olympic National Park (ONP) in Washington State. I'd like to address only Olympic Hot Springs, otherwise known as Boulder Hot Springs or Triple 21 Hot Springs. This natural water source flows into Boulder Creek, a tributary of the Elwha River near the northern border of ONP.

I am writing for the Naturist Action Committee, the "political" adjunct of The Naturist Society. TNS is a national organization that promotes and defends non-sexualized, responsible nude recreation on appropriate public and private lands. Many naturists (skinny-dippers, nudists, etc.) have enjoyed Olympic Hot Springs over the years, and many of *them* have contacted NAC recently regarding the present General Management Plan. The nude use—given what the ONP Park Planner and Deputy Chief Ranger at the site have told me—is not an issue at Olympic Hot Springs. However, many naturists in the Pacific Northwest are concerned that ONP may opt to destroy all of the existing pools at the springs in an effort to bring the site back to a more "natural" state, to reduce litter, to make the water more sanitary, and to offset problems often associated with overuse (e.g., illegal use of mountain bikes, and introduction of artificial objects such as carpeting and cement blocks).

The Naturist Society consists of The Naturists, Inc., the Naturist Action Committee, Inc. & the Naturist Education Foundation, Inc.

After speaking on the phone with various ONP officials and two local hot spring experts, the Naturist Action Committee wishes to urge ONP to include the following in any action it takes at Olympic Hot Springs:

A. Retain soaking at Olympic Hot Springs, but reduce the number of pools at the site to three or four, located near the main source of water. This will improve cleanliness by offering less restriction to flow and allow water to move more efficiently through the limited number of pools and out to Boulder Creek. It will also help rehabilitate the runoff area, reduce the impact of use, and enhance the integrity of the environment.

B. Contract the maintenance of the hot spring resource to an experienced caretaker. This approach has been implemented with great success by other agencies responsible for managing hot spring resources in the Pacific Northwest, such as at Cougar Hot Springs in Oregon.

C. Convert the road (Olympic Hot Springs Road) to a trail beyond the Altair site. This is similar to an item proposed in Alternative B of the draft of the General Management Plan.

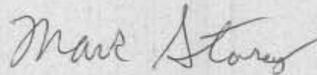
Rehabilitation of Olympic Hot Springs does not require that the resource be made unusable for those seeking remote recreational experiences. Other details of Alternative D, the NPS-preferred plan, accommodate traditional uses, and the traditional use at Olympic Hot Springs should be among those that are retained.

Naturists in this region are well aware of their responsibility in helping to maintain the ecological integrity and social health of this gem of a site. The Naturist Action Committee has already begun to develop a group of volunteers in the region who wish to assist ONP with any cleanup, trail maintenance, or other work that the Volunteer Coordinator (Maggie Tyler) thinks appropriate.

Thank you for your time. The Naturist Action Committee looks forward to working with ONP in any way we can to preserve both the human use and environmental soundness of Olympic Hot Springs.

Please feel free to contact me if you have any questions regarding the Naturist Action Committee or our interest in Olympic Hot Springs.

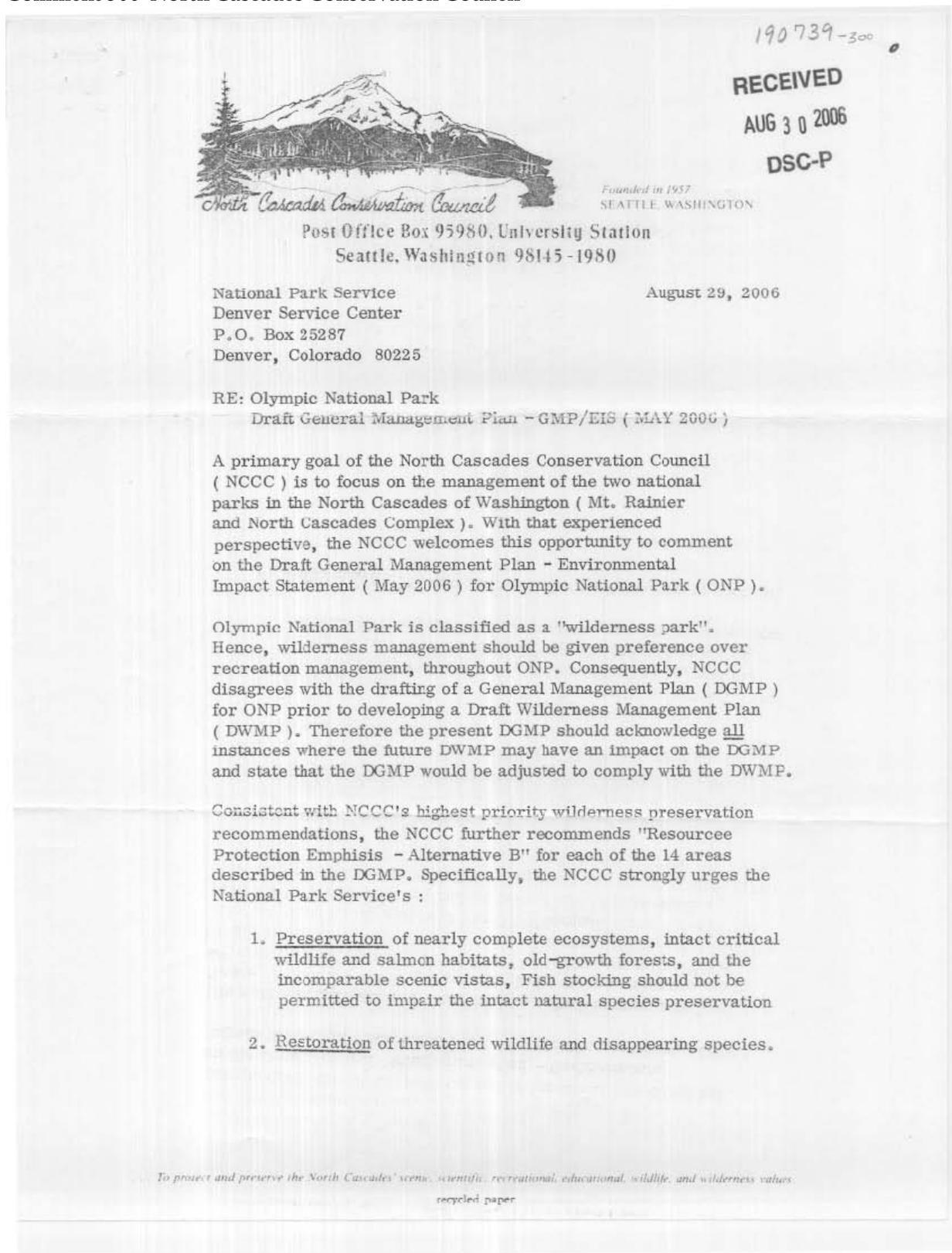
Sincerely yours,



Mark Storey
Naturist Action Committee (www.naturistaction.org)
The Naturist Society (www.naturistsociety.com)

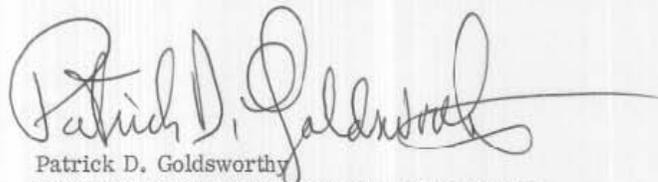
Cc: Nancy Hendricks, Park Planner, ONP
Susan K. McGill, Acting Superintendent, ONP

Comment 300-North Cascades Conservation Council



- 2 -

5. Designate, as part of the Wild and Scenic River Act, those eligible portions of the Bogachiel, Ozette, Calawah, Queets, Dosewallips, Quinault, Duckabush, Elwa, Skokomish, Gray Wolf, Sol Duc, and Hoh Rivers and Royal Creek.
6. Expansion of the ONP boundaries, in Alternatives B, to protect critical habitats for salmon and wildlife, to include the entire Lake Ozette watershed, and increased watersheds of Lake Crescent and the Hoh, Queets, and Quinault Rivers.
7. Development of new recreational facilities should occur outside the ONP boundaries.
8. Management of access to ONP by :
 - a. monitoring and regulating stock use to minimize detrimental impacts in trails and prohibiting grazing within ONP.
 - b. Prohibit all mechanized use (bicycles and motor bikes) on trails in ONP to prevent degradation of, and competition with, peaceful pedestrian use.
 - c. Prohibit off road vehicle (ORV) use on any roadless area within ONP.
 - d. Regulate private vehicular use to prevent excessive congestion and substitute shuttle service alternatives.



Patrick D. Goldsworthy
Chairman North Cascades Conservation Council
P.O. Box 95980, University Station
Seattle, Washington 98145 - 2980

Comment 478-National Coast Trail Association

PEPC 190995 -478



P.O. Box 11045, Portland, Oregon 97211-0045 - (503) 335-3876 - www.coasttrails.org

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**Through Advocacy, Education and Action
For Trails, Public Access and Coastal Preservation**

September 30, 2006

Bill Laitner, Superintendent
Olympic National Park – GMP
National Park Service
Olympic National Park Headquarters
600 E. Park Avenue
Port Angeles, Washington 98632-9798

Hello:

Comments Consistent with National Park Service Mission

The Organic Act of August 25, 1916, states that the (National Park) Service . . . shall promote and regulate the use of Federal areas known as national parks, monuments and reservations . . . to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”It is further noted on the official National Park Service website in their “Mission” section that “The National Park Service still strives to meet those original goals, while filling many other roles as well: guardian of our diverse cultural and recreational resources; environmental advocate; world leader in the parks and preservation community; and pioneer in the drive to protect America’s open space.”

Therefore, this letter represents the National Coast Trails Association’s comments and input on the Draft General Management Plan/Environmental Impact Statement for Olympic National Park that we believe is consistent with the stated mission and roles of the National Park Service. The comments provided focus on our organization’s goals of trail development, enhancement, management and maintenance; and the protection of land and sea within the trail corridor relative to both the “Olympic Coastal Strip” portion of the “Washington Coast Trail” and the developing “Olympic Discovery Trail” within and adjacent to the boundaries of Olympic National Park.

Vision and Relevant Goals of the National Coast Trail Association

The National Coast Trail Association's vision is the "National Coast Trail," a land and water-based trail system around the United States providing non-motorized recreational opportunities to experience the natural, historic and cultural resources along its length. Our priority goal focuses on America's 1,800-mile "West Coast Trail," a hiking trail from Cape Flattery, WA to the Mexican border in California. The "Washington Coast Trail" represents the northern 200-mile section of the West Coast Trail, and the Olympic Coastal Strip a very important segment through Olympic National Park. Also, the Olympic Discovery Trail, another important segment through the park and also the western terminus of the "Pacific Northwest Trail," represents the western end along the entire northern route section of the National Coast Trail vision from the Atlantic to the Pacific Ocean.

Support Alternative "D" But Modify to Emphasize Resource Protection For Olympic Coastal Strip and Lake Crescent

The National Coast Trail Association supports "Alternative D," the National Park Service's preferred alternative with a general management emphasis both on protecting resources and improving visitor experiences. However, in relation to the relatively narrow, isolated and unique coastal wilderness lands of the park's "Olympic Coastal Strip" and the lands north of Lake Crescent we propose that future park management should emphasize natural resource protection, and the preferred alternative modified accordingly.

Boundary Adjustments

Ozette

The trails, beaches and rocky shoreline along the Olympic Coastal Strip from the northern boundary of the park with the Makah Indian Nation to the southern boundary of the park north of the Queets River represents a significant section of the Washington Coast Trail. Important spur trails from the coast are those that take the hiker inland to Ozette Lake. Therefore, in order to begin to enhance opportunities for public enjoyment for those using these spur trails to the Ozette area, we note that the boundary adjustments proposed under both alternative C with a visitor opportunities emphasis south to Bristol Point and alternative D south beyond Bristol point at the very minimum should be included in the final GMP. However, given the relatively narrow area of the entire Olympic Coastal Strip – and its unique significance as true coastal wilderness – it would seem both apparent and appropriate that the value of boundary adjustments which provide at least one much larger area of protected habitat along the coast could not only increase the population of resident species but extirpated species could either re-establish themselves or be reintroduce with success. The rationale being that protection of a much larger area could potentially provide trail users a greater opportunity to experience wildlife both along the immediate coast and the lake plus protect the viewshed up to the surrounding ridges around the lake. Finally, therefore, we propose that both visitors and resource protection values are best achieved by including the resource protection emphasis of alternative B for boundary adjustments in the Ozette Lake area.

Lake Crescent

A segment of the Olympic Discovery Trail not only utilizes the Spruce Railroad Trail along the northern edge of the lake, but also has a spur route coming from the north along the eastern side of the Lyre River. Therefore, in order to enhance opportunities for public enjoyment for those using the trail in this area, we propose not only that the boundary adjustments proposed under alternative "B" with a resource protection emphasis be included in the final GMP but also extended west to include all existing US Forest Service lands in Olympic National Forest to the existing north-south ONP boundary about 1-2 miles west of Fairholme Campground. The rationale being that protection of this area could potentially provide trail users a greater opportunity to experience both land-based and aquatic wildlife and protect the viewshed along the crest of the mountain ridge just north of the lake not only through additional habitat and potentially a migratory corridor, but also by protecting the Lyre River watershed.

Olympic Coastal Strip

Given what we've already stated, especially above relative to the Ozette area, we also propose that boundary adjustments are made that would essentially be expanded east in sections of the strip where present boundaries are less than 1-mile wide. The goal would be to establish at least a 1-mile wide corridor to enhance wildlife habitat and migratory corridors, thereby enhancing opportunities for enjoyment by trail users for increased wildlife viewing along the entire coastal strip.

Second Beach Trail

Given the current situation of closure of the trail to "Second Beach" by the Quilleute Tribe, we would propose resolving the issue to provide public access along this trail to the coast. We realize this is an issue that needs to be resolved by both the National Park Service and the Quilleute Tribe, however, one solution relative to boundary adjustments, that we simply as one potential option would be to explore the possibility, and only if the tribe is willing, of considering a trail easement, and hopefully in perpetuity. Once again, we are only offering this as potential solution for consideration by those parties involved, and hope for future cooperation and consensus between the tribe and the park to resolve the existing access issue to the beach.

Natural Resources

Given the rationale, goals and values already expressed relative to the proposed boundary adjustments above for Ozette, Lake Crescent and the Olympic Coastal Strip as a whole, we propose that a primary objective for Olympic National Park would be to essentially restore natural ecological processes to systems altered by humans. This would include both the areas within their current boundaries and beyond as extended boundary adjustments are realized.

Cultural Resources

Given any specific cultural resource questions involving its proper care and how it should be managed in wilderness areas might best be answered by a process that allows key stakeholders, park staff and even visitors first determine its significance, and then consider and craft a management solution for each one. What could be called the mission of the NPS “to conserve . . . and to provide for the enjoyment” of these and other resources suggests the desired goal for any specific cultural resource. Since the National Coast Trail Association values cooperation and consensus, we therefore propose that a cooperative process involving public and staff be developed and implemented to first determine the significance of any cultural resource, and then to reach a consensus as to how to manage each one to conserve and provide for its enjoyment. Finally, in cases where the objective to conserve a significant cultural is in conflict with providing for its enjoyment, we propose that the primary goal should then become resource protection, i.e., that general public access would not be encouraged or allowed.

Tribal Relations

One primary way the National Park Service could work with the tribes to improve cooperation and coordination and achieve other goals would be to develop and always maintain a working relationship of mutual trust and respect. One initial strategy could simply be to ask tribal leaders for their input about how they think the park could better work with them when providing for visitor opportunities and protecting resources are mutually-shared goals or at least not in conflict with tribal values and goals. Our comments here simply reflect our approach of working cooperatively with others to achieve mutual goals, and although not offered as specific proposals, are given for both NPS and tribal consideration.

Partnerships

We propose that what has already been stated relative to both cultural resources in terms of developing a cooperative process and in general to tribal relations could be adapted and applied to develop and work effectively in terms of partnerships for the protection and visitor enjoyment of park resources. The extent to which the park could develop partnerships could potentially range from a simply expressed willingness to a formal written agreement, such as a Memorandum of Understanding, or even entering into a legal document, to work with the park. Once again, it would seem crucial that partners would either have mutually-shared or complementary goals to maintain a successful partnership. Regarding the Olympic Discovery Trail we would propose the park initiate and cultivate a relationship with the Peninsula Trails Coalition.

Wilderness

We have already addressed what we feel are the appropriate boundary adjustments in order to fulfill the park’s mission, purpose and significance and will therefore focus on what experiences, resource conditions and facilities are consistent with wilderness values. Our focus here will be the Washington Coast Trail along the Olympic Coastal Strip with a brief comment on the section of the Olympic Discovery Trail just north and along Lake Crescent.

Washington Coast Trail

Facilities along the Olympic Coastal Strip should primarily focus on the goals of minimizing overall impact, and providing for sanitation and emergency survival. Given the popular usage of the Olympic Coastal Strip by hikers and backpackers especially during the summer months we propose providing simple enclosed structures for solid human waste disposal in appropriately spaced locations and consistent with the protection of wilderness and resource protection values. Given the potential for developing hypothermia from exposure even during the summer season and the potential for heavy rains and high winds we would propose simple elevated emergency shelters with a roof and three walls be installed in appropriately spaced locations and consistent with the protection of wilderness and resource protection values.

Experiences for the hiker and overnight backpacker along the Olympic Coastal Strip should simply be that of the unique coastal wilderness found there. Defining what the "Olympic wilderness coastal experience" is and how it can be protected, enhanced and restored should be primary goals. However the wilderness coastal experience is defined, it always needs to remain the guiding principle for future management actions. Essential components of this definition would include being able to experience the sights, sounds, and smells, and potentially even the tastes and tactile sensations associated with coastal wilderness. Visually this would include both plant and animal wildlife in terms of both landscapes and seascapes – out as far as the immediate horizon -- through the protection, enhancement and restoration of the coastal wilderness viewshed. Two examples, Ocean Power Technologies is a US firm developing a "PowerBuoy" that floats offshore to extract energy from ocean waves, and inland cell towers could be proposed. Under the proposed "coastal wilderness policy" to avoid their visual impact, their installation along the Olympic Coast Strip would simply not be allowed. This policy would also include the value of both natural soundscapes and lightsapes. The answer as to how wilderness could be protected, enhanced and restored has already been stated earlier in this letter.

Resource conditions along the Olympic Coastal Strip have already been addressed earlier in this letter and focus on achieving the primary goal of both protecting the existing coastal wilderness ecosystem and restoring it, especially where disturbed by human activities. However, as a final but significant comment regarding the restoration and viability of the existing wilderness ecosystem immediately along the coast we offer the following proposal for the park's consideration. Since the coastal strip is a relatively small protected area, the survival of wildlife and other biodiversity are potentially at risk because these areas could be too small to adequately support viable species populations and the ecosystem they need. Therefore, perhaps one management strategy would be to work with the US Forest Service and corporate timber managers to negotiate protected migratory corridors, for example, not generally not allowing general vehicle access, logging, or hunting within their boundaries, such that species are able to safely migrate unimpeded to and from park boundaries of the coast and those further inland. These migratory corridors could actually be relocated as needed through a flexible and adaptive approach that would allow timber managers to manage their resources for their purposes while at the same time meeting the resource protection mission and goals of the National Park Service.

Olympic Discovery Trail

Where the Olympic Discovery Trail enters existing park lands and potential new areas via the boundary adjustments, natural resource protections and enhancements we have already proposed for the Lake Crescent area, we simply propose, given surrounding impacts, that the resource conditions should aim at providing trail users with as much of a wilderness experience as possible where the trail enters north of the lake and then west along the shore.

Visitor Experiences

The “coastal wilderness policy” we already proposed above essentially considers what we would define as a high-quality visitor experience for hikers and overnight backpackers, however other primary questions in this area remain to be answered. Regarding increased visitation while maintaining quality visitor experiences and preserving resources for the Olympic Coastal Strip, we propose the NPS consider the current approach used by Parks Canada in Pacific Rim National Park along one 45-mile section of their coastal strip called the “West Coast Trail” (not to be confused with America’s 1,800-mile trail with the exact name.) The Parks Canada approach uses a quota system, an orientation session addressing issues such as minimum impact techniques, for example, the “tidal flush” method of disposing of solid human waste, and a reservation system during the peak season that allows one to reserve 2 months in advance. Ranger-led interpretive hikes about natural and cultural resources and history along the coast starting and ending at Rialto Beach, Kalaloch or Ozette could provide enhanced educational and recreational activities, protect resources and promote stewardship. Similarly, ranger-led interpretive canoe or kayak trips at Ozette and Lake Crescent could also be considered. Expanded interpretive signage relevant to the resources and history of a specific location both along the coast and in the Lake Crescent area, such as those in the Rialto Beach area, could also be developed in visually non-obtrusive spots along the Olympic Coastal Strip and the lake where hikers and backpackers and others would be able to easily view them. As already stated under “Wilderness” the primary facilities we propose for the coastal strip are ones for sanitation and emergency shelter within the park and along the trail.

Access along the Olympic Coastal Strip

A major logistical challenge for backpackers is transportation either to or from trailheads, and we propose the park partner with public bus transit systems to provide regular, safe, efficient and park-oriented visitor experiences for this recreation user from mid-June through mid-September. A model for this type of partnership is Lewis and Clark National Park with the Sunset Empire Transportation District to shuttle visitors between Fort Clatsop and the western trailhead of their Fort-to-Sea Trail (officially opened November 2005). Given the existence of the Clallam Transit System, Clallam Paratransit and Makah Public Transit, the National Park Service initiate discussion to potentially move to partnering with these public bus services to provide the access needed through transport for backpackers on a regular and timely basis along the Washington Coast Trail from Cape Flattery to the Queets River.

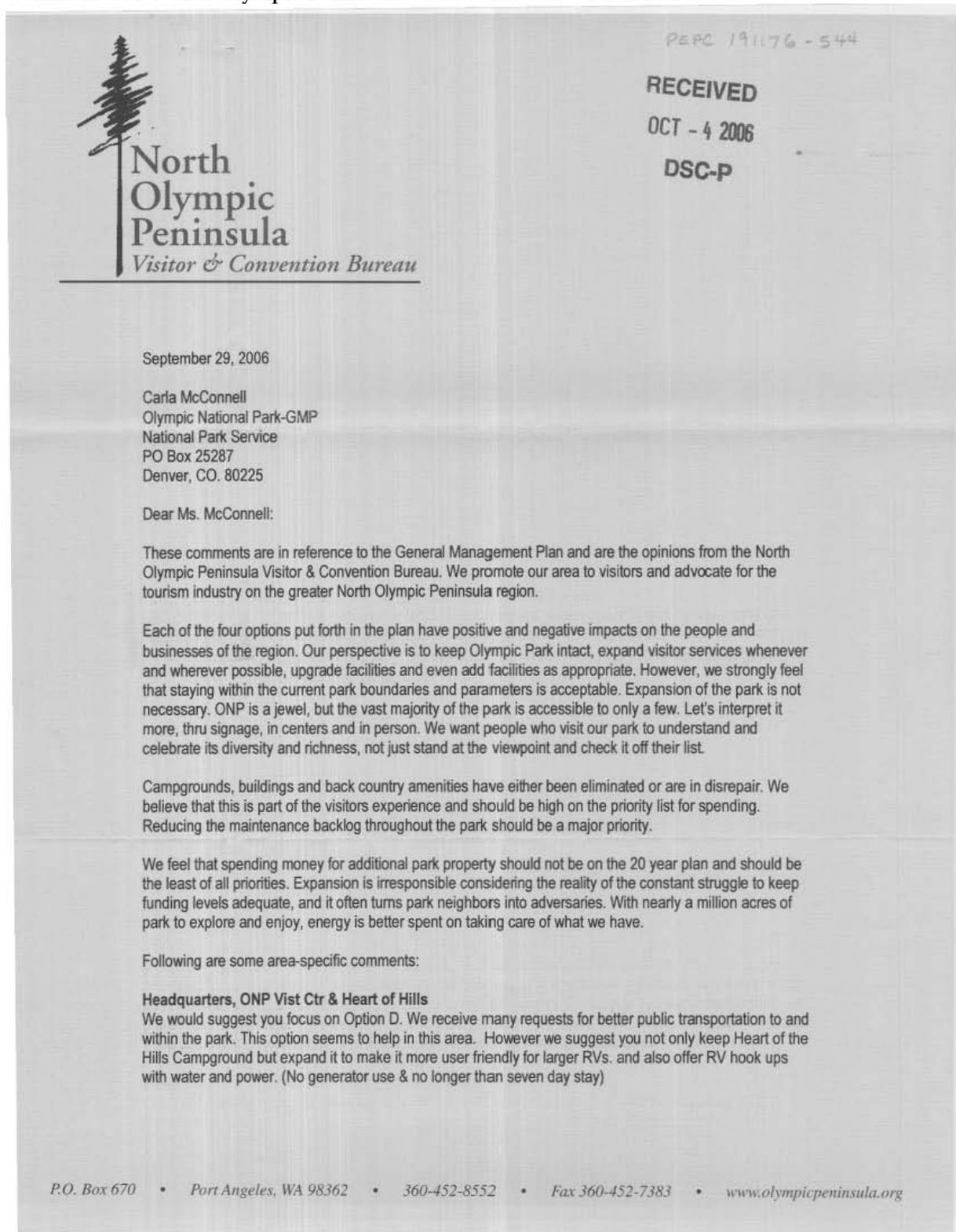
Specifically, starting at the northern terminus of the Washington Coast Trail at Cape Flattery, the Makah Public Transit could consider simply extend their service at least once each regular service day during peak season from their Tribal Center to both the Cape Flattery and Shi Shi Beach Trailheads. Clallam Transit already makes a connection with Makah Public Transit at once on regular service days, and this arrangement would thereby provide backpackers trailhead access on public transportation all the way from Port Angeles to either Cape Flattery or Shi Shi

Beach trailheads. The Clallam Transit System, perhaps in coordination with Paratransit Services, could offer daily shuttles with various buses potentially to and from Ozette, Rialto Beach, LaPush, Oil City, the south bank of the Hoh River, Ruby Beach, Kalaloch, South Campground and to the store just south of the Queets River Hwy 101 bridge, finally to return to Port Angeles at the end of the day's run. This would thereby provide backpackers with a public bus transportation system that would allow them to meet their logistical transportation needs to and from Port Angeles relative to various trailheads along the entire Olympic Coastal Strip and beyond plus connect with other services for transport to major cities such as Seattle, WA and Victoria, B.C. Since roads already exist to all the trailhead connections just specified, it would appear that impacts on natural processes and park resources would be minimal, if not negligible. Finally, we propose the park investigate the idea to potentially offer hikers and backpackers a boat transport service in compliance with US Coast Guard regulations with both the Quilleute and Hoh Tribes to cross rivers of the same name, respectively. If found viable and agreeable to the specific tribe, then we would propose the park facilitate the process towards implementing this water transport service.

We appreciate this opportunity to provide our comments.

Al LePage, Executive Director

Comment 544–North Olympic Peninsula Visitor and Convention Bureau



Hurricane Ridge & Obstruction Point

Having Hurricane Ridge is a universally popular tourist destination, one which is relatively easy for the motorized tourist to access and see the broad vistas of the Park. If the road were to be open more often and more consistently it would be a big plus to our business community. With that in mind we would like to see better snow removal for the ridge road with the opportunity for alternative transportation access. Also allow for significant upgrades of ski area facilities. Recommend putting ski area operations out to bid for a private developer and allow them to enlarge facility.

-We also encourage you to allow Hurricane Ridge Road to be used for Bicycle special events. This ride would be very popular as a hill climb, or part of an organized tour event. Putting a limit on the use to no more than three times per year would be acceptable.

Elwha

-This section is going to be going through major changes in the years to come, as the dams are removed. We like your approach to the growth with the comments in option D

Lake Crescent

-Improving the trail on the North shore of the lake is an important step. We need to have another option for cyclists and get them off 101. Of the options we agree most with option C. Lake Crescent is known as a unique tourism destination and better access would benefit the visitor. Improvement of facilities and the trail system is important, however we do not agree with increasing the boundaries of the park.

Sol Duc

-The Sol Duc area is very popular and definitely would be used more if it were open for a longer season. Therefore we agree with option C

Ozette

-We agree with option D but only with these adjustments:

*improve Ozette Campground to handle larger RVs with power and water. *Allow non-motorized and motorized boating.

However, we suggest that no wake zones be established to help separate the users, which would allow for a better experience for all, and promote safety.

*Park boundaries stay at current levels

Explore partnerships to acquire land easements to protect fisheries and the water quality of the lake

Mora

-We like Option C except we would like the Park to take it a step further. We encourage ONP to do a land swap to allow Quileute Tribe to have access to some higher land, and ONP have an official trailhead and defined access to second beach. This would make a much better trailhead and also allow the tribe to have a safe haven during severe storms.

Hoh

-We agree with the ideas proposed in option D

Kalaloch

-This area definitely needs upgrading. It has much more potential if the facilities were improved. Therefore we agree with option D

Queets

-We would like the Park to pursue option C.

Quinault

-The improved trail and biking opportunities in C would be very welcome. This option would increase the visitor access and make the area more of a destination. We encourage option C.

Staircase

-We agree with option C with the following suggestion.
-Access to the park would be improved for year-round use, if feasible, with the U. S. Forest Service.

We hope our comments will assist in you making decisions that will serve the public and the park for the next 20 years.

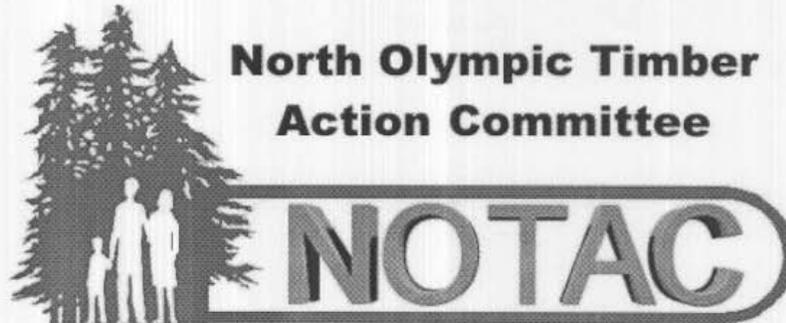
Sincerely,

A handwritten signature in cursive script, appearing to read "Diane Schostak".

Diane Schostak
Executive Director

Comment 445-North Olympic Timber Action Committee

PEPC 190943-445



National Park Service
Carla McConnell
Denver Service Center-Planning
PO Box 25287
Denver, CO. 80225

Re: Olympic National Park GMP

September 28th, 2006

To Whom It May Concern:

The North Olympic Timber Action Committee is a non profit, grassroots organization. We organized in Feb. 1989 to support laws, rules, and regulations which enhance commercial forest management. We also support a stable economy and a healthy balanced environment and we will oppose any effort to curtail or eliminate commercial forest activities.

We cannot begin to express our disappointment in the quality of the draft management plan. It appears to have been poorly researched and hastily written! This GMP draft is an unbelievable waste of taxpayer money. It is grossly lacking in economic data and understanding of the contributions of the forest industry to the Olympic Peninsula and specifically Clallam County.

We oppose any expansion of the boundary line for the Olympic National Park under any alternative mentioned in the draft or developed in the final plan. There are a number of reasons for this statement:

Approximately 90% of the land base within Clallam County is owned by State or Federal Agencies and Tribes. The County Treasurer receives only 21 cents an

acre for 518,812 Federal acres within our County. Payments in Lieu of Taxes (PILTS) are in danger of being eliminated by Congress in the next few years. The citizens of the US by default transfer the tax burden of these Federal lands to the citizens of Clallam County. We do not want or need productive timberland converted to more Federal Land!

The Olympic National Park has decreased its' contribution to family wage jobs impacting the local economy due to your own budget cuts (see note 1 on pg 64) and the corresponding cuts in tourist experience, closures or curtailed programs in campgrounds, backcountry trails, shelters and bridges/roads closed or curtailed due to lack of maintenance. There are huge maintenance backlogs of Park facilities, roads and, bridges affecting the visitor experience and local residents. It is difficult to understand why Olympic National Park needs to expand boundaries when they cannot properly take care of what they have already!

Land Protection/Boundary Adjustments (Pg. 64) are not realistic land acquisition figures and are a good example of how out of touch the writers are with our region and the value of timberland.

The timber industry has spent years supporting rules and regulations to meet the Federal laws for clean air, water and endangered species so there could be some certainty to continue forest management practices and timber harvest. We believe that Washington forests meet the strictest land regulations in the world. If Park boundaries are expanded, another layer of restrictions are added to forest practice applications for forest landowners (Class IV-special) and will make it more difficult and less economic to manage forestlands. Next comes the reduction in property values due to excessive regulations and the Park can take advantage of the "willing seller" at a discounted price.

The draft plan mentions Forest Stewardship Certification management for lands that would be acquired for Washington Department of Natural Resource from privately owned timberland that ONP would hope to buy and trade for scattered mineral rights held by the DNR. The DNR has a constitutional mandate to manage their assets to produce income for various trust beneficiaries. The Park has no business mentioning DNR management practices in this draft plan. (pg. 35)

The economic analysis is vague and incomplete. (pages 162-174) There is no mention of the importance of the family wage jobs contributed by the timber and manufacturing sectors pg. 167) under major industries. Your employment data (table 18) is from 1999. In the past 2 years the forest products sector has invested \$50 million dollars in new manufacturing facilities, creating over 150 direct family wage jobs with benefits in Port Angeles alone. This does not include additional logging and trucking jobs plus the jobs created from having a healthy economy. The Shelton area has also had facilities improvements and job additions matching those in Clallam County. Your draft does not

reflect current economic data and the data you have is poorly written. The Washington Forest Protection Association has substantial data on the economic contributions of the forest products industry to the State of Washington. The Clallam County Economic Development Council could also have provided you with more updated and accurate employment information.

Page 313 contains a number of dramatic statements:

1. "Human activities are producing global climate changes." There are many opposing scientific views on this topic. What source did you use to justify making this statement?
2. "Slope failures and increased sediment delivery on private lands associated with roads and timber harvest can adversely affect hydrologic resources. Timber harvesting and road building have substantially affected slope stability and fluvial erosion on lands adjacent to the Park. Increased sediment delivery to streams has changed streams channels and aquatic habitat and also affected coastal ecosystems." Are you making these comments based on past or current conditions? In the past 20 years the forest industry has been very proactive in addressing problems associated with timber harvest and building forest roads. Forest and Fish Rules, Road Maintenance & Abandonment Plans, and Habitat Conservation Plans have focused on fish habitat and water quality improvements. It appears your draft was written about the past and not the present.

Overall we find it disappointing, that the draft plan seems to place undue blame on the timber industry for water quality issues. Our industry has spent more money and set aside more habitat and riparian areas than any other business or private sector landowner. Science is proving that active management can create desired conditions faster than the natural process.

The North Olympic Timber Action Committee believes that the Olympic National Park is a huge asset to our region. Private timberland is a part of the tourism experience too. Private timberland is available for hunting, fishing, hiking, mountain biking, berry & mushroom picking and horseback riding. Peninsula residents and tourists take advantage of the many recreational opportunities provided within the ONP and private lands. The Park has dramatically decreased its' services over the past several decades due to budget cuts. That brings up the question why the ONP finds it necessary to expand its' boundaries when it does not have a budget to take care of the current assets?

The peak tourist season provides seasonal jobs and is an economic boost to the retail and service sectors in our region but the visitor numbers have been declining. The draft management plan does not explain why the visitor count is declining or how a Park boundary expansion would increase visitor numbers? Please provide us with your analysis of how Park expansion will benefit the tourist economy and justify that benefit against the loss of family wage jobs from the timber industry!

The North Olympic Timber Action Committee is firm in our comments and convictions! We do not support any boundary expansion of Olympic National Park! It appears the park is following its' historic pattern of expanding simply for the sake of expansion. The ONP should draft a plan that addresses the current backlog of maintenance and repairs. It should develop a marketing strategy to improve the visitor experience which would include improved facilities, automated or interactive educational programs for remote sites and campgrounds, improve existing visitor information centers with automated information and quality printed material. GETTING BIGGER DOES NOT MEAN GETTING BETTER!

We cannot begin to express the disappointment in the quality of the draft management plan. It is full of old or outdated data, and appears to have been hastily written and poorly researched. No private business or industry would plan a future management direction the way this draft plan was written.

On February 23, 2006 the U.S. House of Representative, Committee on Resources, stated that "The committee believes that the NPS budget must reflect the following priorities: enhancing the visitor experience, increasing access and reducing the maintenance backlog." (copy enclosed) Olympic National Park should follow that recommendation!

Respectfully,



Carol Johnson
Executive Director
NOTAC

Comment 370-Olympic Coast Alliance



Olympic Coast Alliance

PEPC 190852 D
-370

RECEIVED

OCT 27 2006

DSC-P

September 27, 2006
Olympic National Park Draft GMP
Denver Service Center
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Denver, CO 80225
olym_gmp@nps.gov

To: Park Planners

The mission of the Olympic Coast Alliance is to assure a healthy coastal ecosystem through public education, conservation advocacy, and particularly to support the integrity of the Olympic Coast National Marine Sanctuary. The planning alternatives include many positive aspects, and show deference to our concern for the appropriate management of intertidal zones, river protection, and the use of land immediately adjacent to, and upstream of critical salmon habitat.

We would like to see the park strengthen protection of rivers by recommending Wild and Scenic river designation where appropriate. These rivers are crucial to protection and recovery of Washington State's endangered salmon runs. We must do everything in our power to protect this habitat and minimize harmful actions.

For these reasons we suggest that developed areas and zones in the park are not expanded. Future developments, commercial and recreational, should be located off National Park managed land. This is an environment that is already coping with human impact. Rather, we suggest that the park keep these areas undeveloped and expand its boundaries to include watersheds within the areas of Lake Crescent, Lake Ozette, and the river systems of the Hoh, Queets and Quinault.

The completion of a long overdue comprehensive wilderness plan would be very helpful in addressing our goals. We strongly support the designation of intertidal reserves. In addition we suggest that there be recognized high use areas to contain human impacts to small areas of the fragile intertidal zone. Frequent human presence can have negative impacts on the productivity and biodiversity of these areas.

The recommendation of a wilderness study for Lake Ozette and the designation of intertidal reserves show your dedication to managing these sensitive lands positively. We applaud you for this and urge you to continue positive management of this remarkable park. Thank you for this opportunity to comment.

A handwritten signature in cursive script, appearing to read "Jennifer Mapes".

Jennifer Mapes
Olympic Coast Alliance

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Comment 317-Olympic Environmental Council

PEPC 190794-317



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09/20/2006 09:25 AM
MST

To: olym_gmp@nps.gov
cc: darlenes@olympus.net
Subject: ONP comments on GMP/EIS

Cliff Hawkes
Olympic National Park General Management Plan
National Park Service
Denver Service Center
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RE: Olympic National Park Draft General Management Plan/Environmental Impact Statement (Draft GMP/EIS)

(Please confirm receipt of these comments.)

The Olympic Environmental Council is a 501(c)(3) organization based on the North Olympic Peninsula of WA State founded in 1990. Our primary involvement is in Clallam and Jefferson Counties.

A main concern of ours is the portion of the Olympic Discovery Trail (ODT) which will run through the ONP on the north side of Lake Crescent through wooded areas and along the lake's waterfront. (Pages M13-16). The trail runs between East Beach Road and the Fairholme Campground. It is now an existing trail. It is referred to as the Spruce Trail.

Most likely your Alternative D, point 6 addresses this: "...A universally accessible front country trail would be developed and maintained." We believe this has already been decided.

Our concerns are the following. First, while we support keeping the trail, we do not support paving it. Paving portions of the Olympic Discovery Trail in Clallam County has a toxic history. Once the trail is paved, weeds will collect through and around the pavement. The maintainers of the trail, likely the ODT volunteers, will want these weeds removed. To date the ODT volunteers have turned to introducing herbicides rather than pulling or another method for weed removal. This has contaminated long sections of the trail in Clallam County and has put in harms way the trail users and the wildlife.

Here, at Crescent Lake, the herbicide will be transported into Lake Crescent with wind, rain and fog.

And it will contaminate the trail users and the horses on the parallel trail (assuming a horse trail will be cleared), as well as the land and water local wildlife.

We understand the need to give bikers a route off of Highway 101. The trail is an acceptable alternative. But paving it creates a biker's trail and not a trail for the public at large; not for joggers or walkers who want ground to walk on, not the main users to date, and not the majority of future users.

Second, we are concerned about the increase of human traffic on this trail. This is cougar territory, especially in dry weather. There have been several incidents between panther and humans over the years, including with bikers and joggers. Increase in human traffic means more invasion into this cat's natural territory. How will the cougars be protected and how will the humans be protected? What safety plans have been drawn up? When will the public have a look at these plans?

We oppose paving and, if paving is approved, non toxic methods (and these are available) must be implemented for weed control, perhaps through the use of a steam method. More health and environment harm will come from the use of herbicides than from keeping "front country" bikers on Hwy 101. Too, while this trail invites biker use increase, if herbicides are used anywhere near it, then other citizens -- chemically sensitive and those that want chemical free recreation -- will be unable to use the trail. This is no gain.

In addition to this trail, we regard that first and foremost, protection of the Park's natural resources and permanent residents -- the wildlife, flora and fauna -- be of primary concern and protection. An ecosystem study should be undertaken to provide necessary groundwork for long-term decision making.

We support the expansion of park boundaries in five critical areas (Lake Crescent and Ozette Lake, and Hoh, Queets, and Quinault watersheds) in a manner that conforms with watershed basins to help recovering salmon populations and downstream fish species from destructive upstream timber harvest and road building, and to help protect critical elk habitat. The Park Service should perform Wild and Scenic River eligibility studies for all of the rivers in Olympic National Park, and ensure that the management plan protects endangered salmon.

We support intertidal preserves established on the park's wilderness coast to protect biologically rich marine areas.

We support "river protection zones" to maintain the natural functions of coastal rivers and to keep wild salmon populations intact.

And we support the reintroduction of extirpated species, like the wolf and fisher, to complete a nearly intact ecosystem.

We support the use of mass transit opportunities to the most used park entrance sites which host interpretive, camping and hiking opportunities. This could be done through a contract with the local bus companies in each county. The buses should be retrofitted with the least polluting

technology. Mass transit, hopefully, would reduce the number of autos entering at each point, hence would diminish auto exhaust. It could also be a way to control the visitor number in a park region at any one time.

But road access in the park, including flood plains, should not be allowed where they can impact salmon habitat and the natural river process. Wilderness boundaries should not be moved on active flood plains to maintain problem roads.

We agree there should be a wilderness suitability study for Lake Ozette and that Wild and Scenic River designation is appropriate for the Elwha River. Are there other rivers that should be eligible for the Wild and Scenic River status?

To help reduce air pollution, camp fires should be discouraged.

Expansion of educational and interpretive programs is a good idea. However, we do not support increasing infrastructure foot prints.

Please do not expand development zones from their current size. The Sol Duc campground, for instance, should not be expanded from 82 campsites to 250, or anywhere near this number.

We do not favor expansion of commercial concessions within the park. Rather, we support local businesses having this business. The Hurricane Ridge Visitor Center (HRVC) should not be expanded. The food service there should either be eliminated or replaced with one that offers healthy menu. Fatty food and food with little nutritional value should not be allowed in our national parks, even more so since the U.S. claims to want to eliminate obesity and foods which elevate this. In fact, we don't need a food service at the HRVC. The public should be encouraged to bring their own food or support the local eateries. Doing away with this HRVC service would decrease trash and water and electricity costs.

In park areas that are quite a distance from community resources and maintain food services, these service areas should maintain their present foot print and should provide healthy food choices; again, not foods that push obesity, heart attacks, strokes, diabetes, etc.. A positive example is the present service at Lake Crescent Lodge.

The plan overemphasizes historic preservation at the expense of natural resource and wilderness protection. This point of view should be reversed.

At this juncture in time, a wilderness management plan should be completed before wilderness decisions are made.

Respectfully submitted,

--

Darlene Schanfald, Secretary
Olympic Environmental Council
PO Box 1906
Port Townsend WA 98368

Comment 292-Olympic Forest Coalition



Olympic
Forest
Coalition

Protecting and restoring our Olympic forest and aquatic ecosystems

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DSC-P

July 26, 2006

Olympic National Park Draft GMP
National Park Service
Denver Service Center
P.O. Box 25287
Denver, CO 80225

To whom it may concern:

The mission of Olympic Forest Coalition (OFCO), incorporated as a non-profit in 2002, is to protect and restore the forested and aquatic ecosystems on the public lands of the Olympic Peninsula. As such, we have great interest in the revision of Olympic National Park's General Management Plan. We believe strongly that an adequate GMP will prioritize conservation of the park's natural resources (both within and outside designated Wilderness boundaries), avoid all development that would compromise the integrity of these ecosystems, and actively seek out strategies to restore the park to pre-settlement conditions to the furthest extent possible.

In this respect, we are highly in favor of expanding the park boundaries at Lake Crescent, Lake Ozette, and the Queets River, though the Park Service's preferred alternative (D) is overly modest in this context. Specifically, the proposed boundary adjustments do not adhere to logical watershed boundaries and are insufficient to protect fish species in the lower portions of the drainages in question from logging and roading activities upstream. We recommend enlarging these proposed boundary adjustments to conform with the landscape's hydrologic boundaries, while including additional enlargement of park acreage in the Hoh (inclusion of the South Fork's drainage is especially critical and desirable) and Quinault watersheds, as recommended in Alternative B.

Similarly, we strongly support the establishment of marine intertidal reserves along sensitive areas of the park's coastal strip, motorized boat restrictions and a Wilderness suitability study for the Lake Ozette area, proposed Wild & Scenic designation for the Elwha River, expanding educational programs for visitors across the park, and encouraging mass transit alternatives in developed portions of the park.

OFCO has, however, a number of serious concerns about the preferred alternative. The Park Service's continued devotion to its road system, including those roads within floodplains and with significantly harmful impacts to anadromous fish species, is indefensible. This shortcoming is worsened by the denial of "river protection zone" status to the major streams of the park, which provide critical habitat for ESA-listed salmonids. Moreover, we oppose movement of 1988 Wilderness boundaries for relocation of problem roads - which should in fact be decommissioned. Given the Park Service's mandate to conserve the public's resources on lands the agency manages, perpetuity of the road system must be made subordinant to adjacent natural, native features (both terrestrial and aquatic). The North Shore Road situation at Finley Creek is a particularly regrettable example of

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the need for more enlightened road management.

Alternative D's partiality towards developed recreation and motorized access, at the expense of natural resource protection and species restoration, is also quite troubling. We are very much opposed to proposals to expand development zones from their current size; as evidenced, for example, by consideration of expanding the Sol Duc Campground from 82 to 250 units (the equivalent of making way for a virtual, transient city in the summer months in an otherwise primitive and especially scenic valley). Proposed expansion of commercial concessions yields similar worries, suggesting the likelihood of increased and inappropriate "Disneyfication" of this Biosphere Reserve and World Heritage Site.

It is upsetting, as well, that the Park Service did not pursue a needed ecosystem study to inform longer-term decisions, offered no Wild & Scenic River eligibility study for the dozen rivers which would likely qualify (presumably because it would complicate the agency's bias toward road permanence and/or reconstruction in floodplains), overemphasized preservation of semi-historic structures at the expense of Wilderness protection, and once again shortchanged Olympic by failing to complete a timely Wilderness Management Plan.

Lastly, OFCO's board and membership are unabashed advocates of reintroducing previously extirpated species to the park – particularly the gray wolf. There is no excuse for the Park Service to attempt avoiding a decision on wolf reintroduction in the GMP. You will of course note that a favorable federal government study of this issue is already available. It is the agency's clear, legal responsibility to manage the park in such a manner as to maintain its existing natural attributes, as well as to restore those attributes which have been lost through past mismanagement. We cannot urge strongly enough that the Park Service meet its obligations to the public by endorsing and preparing for necessary wolf reintroduction in the near future. Similar urgency is warranted for planned reintroduction of the Pacific fisher.

Alternative D's timidity, lack of commitment to Olympic's natural resources and ecosystems, and avoidance of several substantial and pressing issues require significant attention on the part of the Park Service. In the final EIS, we look forward to having these concerns better addressed. Thank you.

Regards,



Jim Scarborough
OFCO Board of Directors

Comment 321-Olympic Park Associates

OLYMPIC PARK ASSOCIATES
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Seattle, WA 98177-4306

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September 14, 2006

Carla McConnell
Olympic National park GMP
NPS Denver Service Center - Planning
P.O. Box 25287
Denver, CO 80025

Re: Olympic National Park General Management Plan DEIS

Olympic Park Associates appreciate this opportunity to comment on Olympic's Draft General Management Plan (GMP). We offer these comments in the sincere hope that they will lead to a sound plan and a positive future for this magnificent, world-renowned natural preserve.

As we stated in our scoping comments in 2001, we of OPA share a vision for the park that would protect and restore the outstanding natural and wilderness qualities for which Olympic National Park was established. These qualities are articulated in U.S. House of Representatives, House Report 2247, April 28, 1938 that accompanied creation of the park.

"... preserve for the benefit, use and enjoyment of the people the finest sample of primeval forests ... winter range and permanent protection for the herds of native Roosevelt elk and other wildlife indigenous to the area ... conserve and render available to the people, for recreational use, this outstanding mountainous country ... and a portion of surrounding verdant forest together with a narrow strip along the beautiful Washington coast."

Our goal for Olympic National Park over the next 20 years is a fully restored ecosystem with its original components, processes and habitat functions intact. Human use would be managed to insure enjoyment of the park while protecting the healthy functioning of its ecosystems into the future. We believe, given the park's legal mandates and agency policies, that this should be your goal as well.

As you know, much has changed since the park was established in 1938 -- or since the last management plan was completed in 1976. Olympic is no longer surrounded by vast areas of undisturbed forest. Roads, logging, and residential development of forest lands now define much of the park boundary. Increased recreational use of all types place demands on resources. Cumulative impacts on lower rivers and salmon streams and illegal hunting pressures have impacted park wildlife, fragmented habitats, and impaired ecosystem functions. Visitation to the park is increasing dramatically (doubling since the 1976 master plan). Added to this, climate change is already affecting hydrologic regimes and natural processes in the park and threatens to have major impacts on wildlife habitats from river systems to subalpine meadows.

For a general management plan to deal with these kinds of threats to the future ecological integrity of the park, it must be bold, visionary, and encompass a broad view of Olympic's role in maintaining the larger Olympic ecosystem. Your 1976 master plan provided this kind of guidance for most of the past few decades. We feel the preferred alternative in the current draft falls woefully short.

We appreciate and support those recommendations in the preferred alternative (D) that move the plan in this direction. Particularly, we support the establishment of intertidal reserves. This issue has been exhaustively discussed by the Olympic Coast National Marine Sanctuary advisory committee. Recommending establishment of the reserves is a bold step, and one to which we hope you will remain committed.

We support the park's intent to recommend boundary expansions to protect habitats for threatened and at-risk wildlife populations. As you know, it will be up to Congress to legislate any additions to the park. We urge you to take a broad, long-term perspective on these recommendations and let the political process do the compromising.

We strongly support a wilderness study for Ozette Lake, Pyramid Peak ridge, and future additions. Ozette is the last coastal wilderness lake outside Alaska and richly deserves protection. We support wild and scenic river designation for the Elwha, but we fear the significant expansion of the development zone in the valley works against watershed restoration.

We support the Kalaloch Lodge, facilities, and highway relocation. And we support the park's intent to expand educational and interpretive programs, develop short interpretive trails, and encourage mass-transit in high-use areas. We request a shuttle be required on the Obstruction Point road during peak season to alleviate constant clouds of dust, parking overflow, and engine compartment temptations to marmots.

All of these recommendation make a good start toward a GMP worthy of a World Heritage Site and international biosphere reserve.

On the whole, however, we find the preferred alternative of the draft GMP to be lacking in the critical qualities mentioned above: boldness, vision, and sense of the park's place in the larger Olympic ecosystem.

The draft is timid in its approach to resource protection, and many of its protective measures are compromised and inadequate to protect park resources into the future.

Specifically, the preferred alternative (D):

- * offers inadequate measures for recovering threatened and endangered or at-risk wildlife species
- * offers boundary expansions that fail to conform to watershed and topographic features, and are inadequate to protect and restore target wildlife populations
- * fails to protect irreplaceable habitats such as low-elevation and floodplain forests, and offers inadequate protection for rivers, riparian areas, and critical salmon habitats
- * inordinately expands front country development zones far beyond current uses or any reasonable future use
- * favors roads and motorized access at the expense of fish and wildlife habitats
- * is overzealous in approach to cultural resource protection throughout the park, and
- * threatens the integrity of the Olympic Wilderness.

Further, we feel the draft plan misses the opportunity to address a number of larger issues that would insure sound ecosystem management in the face of an uncertain future. We ask park planners to reconsider these recommendations, outlined in our 2001 scoping letter, for inclusion in the final GMP.

- * an ecosystem study from which to base critical resource management decisions
- * a recommendation to reintroduce wolves into the Olympic National Park
- * wild and scenic river recommendations for at least 12 park rivers that qualify for congressional designation, and
- * a wilderness management plan that will address numerous controversial decisions regarding wilderness management in light of requirements of the Wilderness Act.

We will address these and other issues under some general headings. We will supply rationale where appropriate and recommend changes in the draft that may improve prospects for sound ecosystem management.

Wilderness

The discussion of desired conditions for wilderness in chapter 1 (p. 26) is flawed. The interpretation of "lower standards" as displayed in your matrix has been refuted by two recent U.S. federal court decisions, including *Olympic Park Associates v. Mainella* (2005). In that decision Judge Burgess found NPS managers guilty of "a clear error of judgment" in their interpretation of historic preservation in wilderness. The lower standards clause in no way gives priority to the National Historic Preservation Act or DOI or NPS administrative policies. Wilderness designation places "a new value" on the land, in Judge Burgess' words, i.e. a clear mandate to preserve wilderness character.

The plan states the NPS will maintain all existing and potential national register properties in wilderness. Appendix E lists "classified structures," to be maintained. Twenty-nine (by our count) are located in wilderness. This list includes at least one structure no longer standing. Another 21 are to be evaluated, "properties" that include some weathered piles of logs, an obsolete research facility, and a sawmill ruin. We have little doubt that all of these will make the cut.

For the GMP to decree that some fifty structures and eight "historic landscapes" (including the "USFS trail system") will be maintained in wilderness in a forthcoming wilderness management plan -- without addressing necessity under the Wilderness Act or their impacts on wilderness character -- is contrary to the Wilderness Act, NPS wilderness policies, and the scope of this plan.

Similarly, to zone the Olympic Wilderness into use zones, including some 500 miles of trails, campgrounds, primitive trails, and cross-county routes without providing any detail or specific rationale for is clearly beyond the scope of the present plan. We prefer the wilderness uses sketched in alternative B, but we are unable to comment on your alternatives for wilderness zoning due to the plan's lack of specific reference or rationale for these designations.

The GMP seems to be attempting to make up for the park's lack of wilderness management plan by front-loading several controversial decisions -- decisions that deserve full discussion of rationale and impacts -- in the current plan. This shorthand planning process shortchanges wilderness management and does a disservice to your wilderness planning effort. It will not meet a legal challenge.

The GMP should direct the park to produce a wilderness plan that will guide management under the clear mandates of the Wilderness Act. If specific wilderness decisions are to be put forth in this plan, then a complete discussion of their legality

under the Wilderness Act and impacts on wilderness character must be fully explored. Information on which the public can assess decisions affecting wilderness is nonexistent in the current draft GMP.

Rivers

With the increased frequency of flooding and resulting road washouts experienced by the park and national forest in recent years (possibly linked to global warming's effect on rain and snowfall regimes), river and road management deserve careful planning.

The park's rivers provide habitat for 70 stocks of salmonids, a number of which are in decline and considered at risk by fishery managers (1992 Washington State Salmon and Steelhead Stock Inventory), as well as critical habitat for several special status fish.

With salmon declines regionwide, rivers should be afforded the highest levels of protection. We urge you to reconsider your river protection zones (offered in Alternative B). Mitigative measures for all alternatives quoted on p. 76 include "Delineate 100-year floodplains and minimize development in these zones." This directive would seem to require that the river zone concept be incorporated into the preferred alternative. It is the only measure in the GMP that offers adequate protection for fish habitat and naturally sustainable river ecosystems, restricts bank armoring, and protects the fisheries resource "unimpaired for the enjoyment of future generations." We also ask that you review river reach analyses (done for several west end rivers) to identify future trouble spots in advance of flood events and plan road and transportation systems accordingly.

The plan's assurance in the preferred alternative that roads will be maintained "using methods that minimize adverse effects on river processes and aquatic and riparian habitats, to the extent possible" fails to convince. In light of the recent rock armoring of the Sol Duc River Road without habitat mitigations, the park's insistence on reconstructing the Dosewallips Road regardless of impacts on critical habitat for federally listed threatened Puget Sound chinook, and the GMP's decision to continue destructive channelization of Finley Creek indefinitely, we have little confidence that future road reconstruction will be any different without strong protective measures made explicit in this plan.

At the very least, we urge you to include language in your preferred alternative that will restore some of the protections offered by the river zones: "Prime fish and wildlife habitat will be protected in naturally sustainable river ecosystems" (p. 57). "Natural resources may be minimally but not permanently modified for access purposes" (p. 57). "River bank or meanders would not be hardened or altered. Natural flooding and hydrologic processes would be allowed to occur" (p. 57). And "The riparian and floodplain habitats of rivers, streams, and estuaries would be protected" (p. 58).

Salmon habitats have been and continue to be impaired by the park's road program. The GMP planning process offers the possibility to reevaluate in light of current scientific findings and change course. We are dismayed that the preferred alternative's emphasis on maintaining road access takes precedence over protecting one of the park's most threatened and irreplaceable resources, its diversity of wild salmon stocks.

We object to the draft's decision to continue the annual bulldozing of the Finley Creek channel. The Finley Creek situation would be aided by bridge removal and summer grading of the stream crossing during the dry season, as considered in an earlier EA. Again, the draft plan front-loads a future planning effort with an unfortunate and short-sighted decision. The current situation is harmful and unsustainable. Eventually, natural stream dynamics should be restored in this area.

Wild and Scenic Rivers

In our scoping comments OPA requested that park rivers be evaluated for eligibility for inclusion in the national Wild and Scenic Rivers System, and that the GMP make recommendations to Congress. The Wild and Scenic Rivers Act requires federal agencies to study rivers for eligibility in their planning efforts. NPS management policies also require this (Section 2.3.1.10). We support the GMP's recommendation for the Elwha, but we are at a loss as to why the other eligible park rivers were not studied or considered.

The 1990 Olympic Forest Plan evaluated rivers for eligibility and made recommendations on rivers primarily in their jurisdiction. The forest service deferred to the park recommendations for rivers that were predominantly in the park's jurisdiction. We believe those evaluations are available for review and urge park planners to review them. We also request the Queets and other park rivers not reviewed by the forest service be evaluated in the final plan.

The Wild and Scenic Rivers Act was passed in 1968. Olympic National Forest published its recommendations in 1990. The park service has had ample time to review the exceptional wild and free-flowing rivers in its jurisdiction and make recommendations to Congress. If the final GMP must be delayed to complete this obligation, it will be worth the effort.

Boundary adjustments

We commend the park service for planning for the future by recommending land additions in critical habitat areas to help protect wildlife species. We realize that these are controversial recommendations on the local level, but given impacts to park wildlife from destructive activities outside the park, we recognize that boundary adjustments are often the only way to insure permanent habitat protection.

The boundary adjustments offered in Alternative B appear to be informed by wildlife science, and we support them in every sense. Park managers should keep in mind that these are agency recommendations. Final boundary adjustments will result from congressional action and the political give-and-take that accompanies that process. Park recommendations should be sufficient to accomplish the objective of wildlife protection and ecosystem restoration.

Ozette Lake. The proposed boundary expansions for Ozette Lake in alternative B follow the hydrographic divide of tributaries making up the Ozette Lake watershed. The wisdom of including the entire watershed within the park allows restoration and planning activities to be determined by a single agency – one dedicated to protecting natural systems. By removing abusive (albeit legal) logging practices that have resulted in siltation to the lake and its tributaries and harm to its threatened sockeye population, the advantage to the recovery process for Ozette Lake sockeye would be enormous. It would take years, possibly decades for the land to be acquired on a willing seller basis and restored to natural conditions. But the last wilderness coastal lake in the world would be fully protected, and park planners would have room to manage adequately for future uses.

The addition recommended in the preferred alternative fails to address the impacts of industrial logging on the Ozette watershed. While an improvement over current boundaries, proposed boundaries do not make sense ecologically, and by allowing continued logging abuses in the basin, they offer little hope for ecosystem restoration for the Ozette watershed.

We cannot endorse the proposed land acquisition and exchange with Washington's Department of Natural Resources. More details would be needed to fully evaluate this proposal, but turning federally purchased land over to the kind of maximum timber harvest practiced by the DNR without the minimum ecological protections assured by Forest Stewardship Council (FSC) certification is self-defeating. The timber-industry certification offered represents the same kind of abusive forest practices that condemned the Ozette sockeye to the endangered species list in the first place. It is disturbing that the National Park Service is advocating such a measure.

Lake Crescent. The fortunes of the Cresceni and Beardslee trout of Lake Crescent have been dire in recent years. Both populations declined markedly during the 1990s with Beardslee numbers dropping below 100 in 2000. Major impacts to both fish's spawning areas in the Lyre River occurred when a 1997 slope failure resulting from logging steep unstable ground in the Boundary Creek drainage sent thousands of tons of sediment into Boundary Creek and the Lyre River drainages.

Expanding the park boundary north at Lake Crescent to include critical spawning reaches of the Lyre River and all of the Boundary Creek drainage (as recommended in Alternative B) would ensure that critical spawning habitat for these fish would be protected. Most of Boundary Creek is already in federal (forest service) ownership. Additional private acquisitions beyond the preferred alternative would be modest.

By offering inadequate protection for the Boundary Creek watershed, the preferred alternative opens the door to further impacts of Lyre River spawning areas. With the reduced Beardslee and Cresceni numbers of recent years, this does not insure the future of these unique fish.

Quinault. The modest adjustment of the south boundary to include the rivers floodway would be an improvement, insuring comprehensive management of the river zone. We're aware, however, that prospects for armed insurrection in the area must be taken into account.

Queets and Hoh. We endorse the inclusion of the northern drainage of the lower Queets River within the park as proposed in Alternative B, to protect important seasonal habitat for Roosevelt elk and coho salmon habitat. The addition would afford much more protection for the compromised Queets corridor, and more than the modest boundary adjustment offered in the preferred alternative.

The South Fork Hoh River. Wouldn't that be nice.

Developed areas

The development zone standards and the size of development zones in the preferred alternative are entirely out of scale for a wilderness park like Olympic. Descriptions of development zones should be scaled down to comply with current uses at Olympic, and development zones should be expanded only when there is no other way to accommodate necessary visitor services outside the park.

Development zones in Olympic should accommodate campgrounds of no more than 100 sites (200 for Kalaloch). The 250 campsite figure (which more than triples the size of some of your largest campgrounds) is wildly out of scale with current and projected needs at Olympic. Campground expansion, where it occurs, should emphasize tent and small vehicle camping, leaving the accommodation of large, self-contained recreational vehicles to commercial facilities outside the park. It is unwise to sacrifice low-elevation, floodplain and old-growth forests, where most campgrounds are sited, in order to accommodate large, polluting, noise-generating RVs.

The preferred alternative's dramatic expansions of developed zones at Elwha (two miles along the Elwha River Road and a mile of Lake Mills shoreline), Sol Duc (one-half mile of floodplain west-northwest of the resort), and Hoh (approximately 300 acres of old-growth temperate rainforest north of the visitor center) are both worrisome and baffling. No justification for this level of increased development is offered in the draft, or any indication of the types of development (existing services or new

commercial development) is given. Further, no acreages for these zones are provided, thus limiting the public's ability to evaluate these proposals. A simple table comparing acreages for these zones for the various alternatives would be extremely helpful.

These zone expansions represent a radical departure from existing uses and a level of future development inappropriate for a natural preserve like Olympic. As we suggested in our scoping letter, development on this scale should be located outside the park where local communities can reap the economic benefits of providing visitor services.

Proposed development expansion in the Elwha is particularly troubling given the effort and expense being undertaken for dam removal and ecosystem restoration. One of the conditions that helped drive the restoration was the pristine nature of the watershed inside the park. With dam removal imminent, is this the time to alter the natural conditions of the watershed with miles of expanded development zone for the Elwha? We think not.

We commend the park on its decision to remove the Kalaloch development away from the coastal area. We urge moderation in planning replacement facilities.

Extirpated species

Restoring extirpated species should be a high priority for the park. We suggest that "Reintroduce extirpated special status species" be added to mitigative measures on p. 77, and that the restoration of extirpated species become a desired condition for the future of the park. We appreciate the park's cooperation with Washington Department of Fish and Wildlife's effort to restore fisher to Olympic National Park. It would be appropriate for the GMP to give guidance and approval to this restoration.

Similarly, a good case has been made for wolf reintroduction at Olympic. The U.S. Fish and Wildlife Service's 1999 feasibility study for wolf reintroduction found that there was sufficient prey and habitat to support a population of some 50-plus wolves in the Olympics. An earlier survey by Defenders of Wildlife found the idea was popular on and off the peninsula.

The experience at Yellowstone has demonstrated the tremendous power of ecosystem revitalization brought about by wolf reintroduction. The same could be true for Olympic, particularly regarding coyote population control and reducing coyote predation on declining marmot populations. In time, wolf reintroduction could stand beside Elwha River ecosystem restoration as the capstone of a revitalized ecosystem. We request the GMP provide guidance that wolf restoration be a desired natural resource condition and recommend reintroduction.

Non-native species

The park's draft environmental impact statement on non-native mountain goats has been in limbo for more than a decade. Our members have reported increasing numbers of goats in many areas of the park, obvious goat damage to plant communities and have witnessed goat-human interactions at several locations. In short, the goat problem is once more rearing its horny head.

We understand your reticence to offer management direction for goats in this document. But your discussion of nonnative species (p. 111-112) is wholly lacking in direction for any nonnative wildlife. The park has a recognized mandate to manage nonnative populations and where appropriate, remove them. This issue requires a much fuller discussion in the Final EIS.

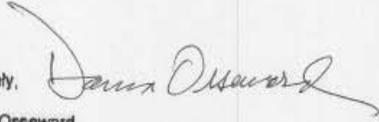
Conclusion

While the DEIS offers considerable discussion of balancing resource needs with human use, we find the plan is distinctly out of balance. The preferred alternative displays a pronounced bias toward motorized access, increased development, and a preoccupation with cultural resource protection. On nearly every critical issue, natural resource protection is compromised to accommodate the above uses. Habitat needs of special status species are too-often ignored, and wilderness protection is compromised by peremptory management decisions.

An example of this bias is evident in development zones. Nearly all the expanded development zones in alternative C (visitor opportunities emphasis) have been included in your preferred alternative (Hoh is much larger in the preferred, though Kalaloch is slightly smaller). In contrast very few of the natural resource protections offered in alternative B appear in the preferred unaltered. Ecological boundary adjustments, river zone, and "primeval" wilderness zone have been compromised or dropped. At the same time, radical cultural resource protections (blanket preservations of "classified" lists of structures and landscapes) are treated as sacrosanct.

Similarly, we find the draft's analysis of impacts of the preferred alternative inadequate and lacking in clarity. Language such as found in your conclusion of impacts on hydrologic systems, "Implementing alternative D would have a long-term moderate beneficial effects and long-term minor to moderate adverse effects on hydrologic systems" (p. 315) is not useful.

Sincerely,



Donna Osseward,
President, Olympic Park Associates

cc: Regional Director Jon Jarvis
U.S. Congressman Norm Dicks
U.S. Senator Maria Cantwell
U.S. Senator Patty Murray

Comment 203-Olympic Peninsula Audubon Society

PEPC 190549-203



Olympic Peninsula Audubon Society
P.O. Box 502, Sequim, WA 98382
www.olympicpeninsulaudubon.org
Representing more than 550 Clallam County Members

Promoting Birding and Conservation as Community Educators, Volunteers, and Stewards

September 7, 2006

Olympic National Park General Management Plan
National Park Service
Denver Service Center—Cliff Hawkes, DSC-P
P.O. Box 25287
Denver, CO 80225-9901
Olym_gmp@nps.gov

Dear Superintendent Laitner,

We appreciate the opportunity to comment on Olympic National Park's General Management Plan.

The Park's preferred alternative, Alternative D, takes a balanced approach between resource protection and visitor use. We support Alternative D in its main provisions. However, we believe portions of Alternative B, which favors resource protection, should be blended into Alternative D.

Area boundary adjustments proposed in Alternative D total about 16,000 acres. However, adjusting the Park's boundaries by 87,000 acres, as proposed in Alternative B, would greatly add to improved watershed and ecological protections. The larger boundary addition should be the overarching goal of the final General Management Plan, along with commercial activities continuing at current, but improved, levels.

1. We support Alternative B's larger boundary adjustments in the five lake areas (Crescent, Ozette, Hoh, Quinault, and Queets) and the Hoh River corridor because it will help better protect the habitats important to wildlife.
2. While we support the Plan's concept of upgrading the developed infrastructure in the front country and relocating some camping and lodging away from sensitive areas, we do not support increasing the number of camping sites and lodging facilities. An exception might be in the Ozette area if future Park

boundaries are expanded...new facilities in clearcuts, away from sensitive areas, could be considered.

3. River protection corridors should be established to ensure that critical salmon habitats and natural river processes are protected. This is proposed in Alternative B. When the Olympic National Forest conducted a study in 1990, it found that 14 rivers were considered eligible for federal Wild and Scenic Rivers designation. We strongly recommend that the ONP GMP include objectives of adopting Wild and Scenic designation for the Park's rivers. Congress declared the Wild and Scenic Rivers Act to be . . . "the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations."

4. We support the Plan's proposal (in both B & D) to establish intertidal reserves on the Olympic Coast and recommend a wilderness study for the Lake Ozette region and the lands proposed for adding to ONP.

5. We support bringing ONP's wilderness back to being a more complete, natural habitat by restoring extirpated species, such as the wolf and fisher.

6. We recommend that seasonal shuttle transportation be provided, and its use required, on corridors such as the Obstruction Point Road where dust control is a recurring problem and trailhead parking is limited.

We appreciate the Park's work in producing a thorough, usable, and factual report, one that is worthy of the Park it represents and is worthy of the skilled management job the staff currently performs. Thank you for your attention to our comments.

Sincerely,

Sue Chickman
Conservation Committee
Olympic Peninsula Audubon Society

Comment 305-Pacific Northwest Trail Association

PEPC 190764-305

Name: Daniel M. Collins
Organization: Pacific Northwest Trail Association
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Correspondence Information

Status: New **Park Correspondence Log:** 190764
Date Sent: 09/25/2006 **Date Received:** 09/25/2006
Number of Signatures: 1 **Form Letter:** No
Contains Request(s): No **Type:** Web Form
Notes:

Correspondence Text

Trail corridors throughout the Park lands and particularly those trails of regional significance should receive concentrated trail maintenance and rehabilitation. Expansion would be a good role after existing trails are brought up to standards. Also, consider that many trail points of interest often are more than 6 miles from trailheads, and therefore it is paramount that access for stock animals be provided so that trail work teams supplied by stock animals can provide necessary maintenance throughout the trail system. Good stock and hiker access becomes a symbiotic relationship in this regard.

The future changes to park visitation for both the new scientific and recreational value caused by the Elwah Dam removal appear to be understated.

With regard to park structures and concessionare facilities I am of the opinion that these need to be built and maintained in a "grander style" consistent with what exists in our other national parks particularly in view of the beautiful timbers harvested from the Olympic Peninsula over the last 100 years. For instance, why are the cabins at Sol Duc Hot Springs odd, non-descript, and reminiscent of cheap dwelling units?

Finally, in the Olympic National Park planning efforts that will come after this General Management Plan is adopted, it will behoove the park service to work closely with the indian tribes in crafting access provisions, and facilities for visitation for the good of the whole.

Thank you for your consideration.

Sincerely,

Daniel Collins, Regional Coordinator PNTA

Comment 589—Peninsula Citizens for the Protection of Whales

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OCT - 2 2006	OCT - 2 2006
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Comments on Olympic National Park
General Management Plan -

My comments will concern a topic not mentioned in the Draft. I did attend the open house in Port Angeles and asked whether it was a moot point to comment on an issue not referred to. The answer was: "Please comment on anything!"

So - in a nutshell, many people are concerned about various potential impacts of a revived Makah whale hunt. The issue is now "on hold" as the NMFS/NOAA prepares a court-ordered EIS. However there is a fair likelihood that whale hunting will resume in the near future. The preferred timing and location of whale hunting by the Tribe could and has varied from "no time or area restrictions" to "fall-winter-spring hunts on the outer coast". In either

(2)

scenarios there will likely be whales pursued, harpooned, and shot at with a .50 calibre anti tank gun in the near-shore waters just off the Park wilderness beaches from Shi-shi to the Norwegian Monument. The whale shot in 1999 was taken within a half mile of the beach near Father + Son rock. As that whale was being shot at from a motorized boat, several bullets missed + flew off through the air. Toward shore? Maybe.

Ballistics expert Roy Kline testified to the 9th Circuit Court that a .50 cal bullet can travel many miles on a missed or ricocheted shot. That undisputed testimony caused NMFS/NOAA to withdraw support for a hunt area inside the Straits to Tongue Point based on the

(3)

danger to the public. Public safety trumped the Tribe's desire to hunt in the calan near-shore waters of the Strait.

The same danger exists for Park visitors camping or hiking on the Wilderness Coastal Strip.

This information was given to Supt. Dave Morris in 2001.

We had a good dialogue on the topic + it was suggested to him that the Park express safety concerns to the NMFS EIS process. He agreed that would be appropriate.

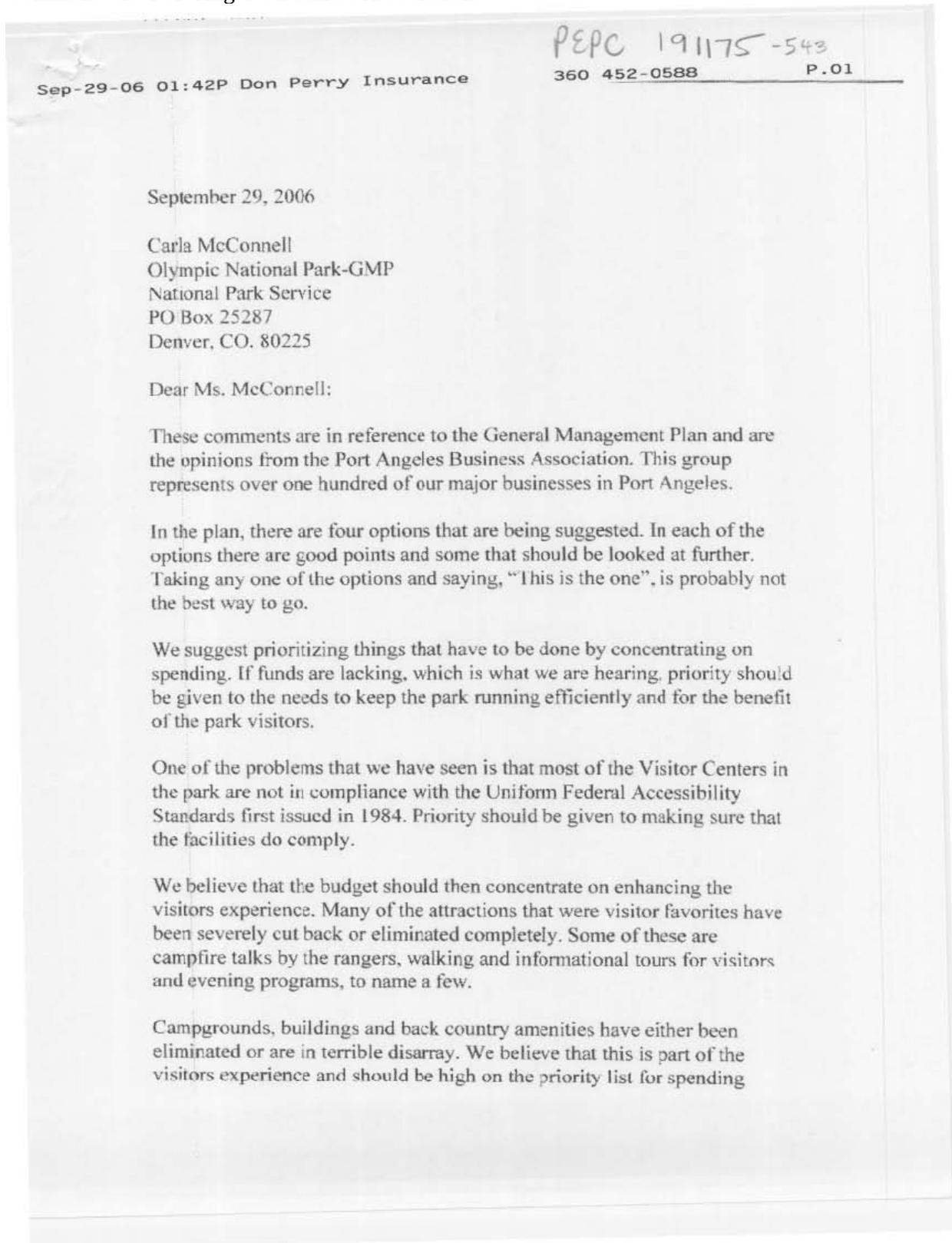
The issue of Treaty rights and park safety would be resolved if the Makah whale hunts of the future took place at least five miles off shore. That would place the hunt in the migratory corridor while keeping the .50 cal weapon at a safe distance from the Park.

④

We recommend immediate communication of these concerns to NMFS/NOAA. A "big game hunt" with a big gun has no place within range of our Wilderness Park area.

Thank you for your consideration of this issue -
Margaret Owen
Margaret Owen
for Peninsula Citizens for the
Protection of Whales
612 Schmitt Rd,
Port Angeles, WA,
98363
ph. (360) 928-3048

Comment 543-Port Angeles Business Association



Sep-29-06 01:43P Don Perry Insurance

360 452-0588

P.02

rather than new construction projects. Reducing the maintenance backlog should be a major priority.

Having quality concessionaires for the various visitor centers and lodges should be a priority but we believe that it should go a step further by putting priority on locally made souvenirs and gifts in the gift shops. If I was a visitor from outside our area, it would frustrate me to buy a sweatshirt that says "Hurricane Ridge" then look inside and see that it was made in China. We believe that the local economies could benefit from purchasing locally.

We feel that spending money for additional park property should be the least of all priorities. Why expand when we don't have the funds to maintain what we have.

There are far reaching considerations on land acquisitions as well. In our area, most of our property is in park property. We have an obligation to the private industry in our area to keep "Living Wage Jobs". Local loggers and forestry related jobs could suffer considerably by the expansion of the park in our area. Great care should be taken when expanding.

To summarize. Spend money on taking care of what we currently have and improving the visitors experience by making our park more accessible and attractive. Lets spend our tax dollars on these priorities before spending money to expand.

We hope our comments will assist in you decisions.

Sincerely;

Orville Campbell
President

Comment 596-Port Angeles Business Association

PEPC 191258-596

OLYMPIC NATIONAL PARK
DRAFT GENERAL MANAGEMENT PLAN

COMMENT SHEET ONP - GMP

Send this form to:
National Park Service
Denver Service Center – Cliff Hawkes, DSC-P
PO Box 25287
Denver CO 80225-9901

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DSC-P

UNIVERSAL ACCESSIBILITY

The highest priority should be to identify and remove all barriers to accessibility in compliance with the Architectural Barriers Act of 1968 and the Uniform Federal Accessibility Standards first issued in 1984.

Many of the residents of and visitors to the North Olympic Peninsula are older people and many are persons with disabilities. These usually visit as couples or family groups. Lack of universal accessibility to park facilities usually discourage visitation by these.

Page 140 of the Draft General Management Plan states: "Visitors with mobility disabilities have access to educational and lodging facilities, nine developed campgrounds, and two very short interpretive nature trails." Recent onsite investigation shows this is NOT TRUE for the Olympic National Park and the Hurricane Ridge Visitor Centers.

Provisions must be made for unisex accessible toilet facilities to allow use by others to assist persons with disabilities. [These will allow a man to assist his disabled wife, a mother to assist her disabled son, etc.]

All newly designed and constructed pedestrian trails or altered portions of existing pedestrian trails, camping facilities, picnic areas, and beach access routes must be accessible in compliance with the Accessibility Guidelines for Outdoor Developed Areas developed by the United States Access Board. A high priority should be development of more short interpretive nature trails.

Development of steeper trails requiring assistance for those using wheelchairs should have a lower priority.

First Name EARL Middle Initial P
Last Name FULLINGIM
Organization PORT ANGELES BUSINESS ASSOCIATION
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Address 2:
City: PORT ANGELES State/Province WA
Postal Code: 98362-4951
E-mail: earl.fullingim@mac.com

OLYMPIC NATIONAL PARK
DRAFT GENERAL MANAGEMENT PLAN

COMMENT SHEET ONP - GMP

Send this form to:
National Park Service
Denver Service Center – Cliff Hawkes, DSC-P
PO Box 25287
Denver CO 80225-9901

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TRANSIT

The Draft General Management Plan states for Alternates C and D: "Increases in frontcountry day use visitation might be facilitated with a park transit system and in-park and regional facilities to disperse use."

A park transit or a regional transit authority would have to be accessible to comply with US Department of Transportation accessibility standards. A separate system for persons with disabilities would be unacceptable because it would discrimination on the basis of disability.

A system of private, tour guide services would be preferred to serve persons with disabilities AND their companions or families.

First Name EARL FULLINGIM Middle Initial P
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Comment 208–Port Angeles Regional Chamber of Commerce

190555-208



PORT ANGELES CHAMBER OF COMMERCE
121 East Railroad Port Angeles, WA 98362 (360) 452-2363

Carla McConnell
Olympic National Park-GMP
National Park Service
PO Box 25287
Denver, CO. 80225

Dear Ms. McConnell:

These comments in reference to the General Management Plan are the opinions from the Port Angeles Regional Chamber of Commerce Board of Directors. This board represents 545 members on the Olympic Peninsula. We hope you find our observations helpful.

Headquarters, ONP Vist Ctr & Heart of Hills
-We would suggest you focus on Option D. We receive many requests for better public transportation to and within the park. This option seems to help in this area. However we suggest you not only keep Heart of the Hills Campground but expand it to make it more user friendly for larger RVs, and also offer RV hook ups with water and power. (No generator use & no longer than seven day stay)

Hurricane Ridge & Obstruction Point
-Option D appears to be the best choice here. Having Hurricane Ridge road open more often and more consistently would be a big plus to our business community. With that in mind we would like to see better snow removal for the ridge road. Also allow for upgrade of ski area facilities. Recommend putting ski area operations out to bid for a private developer and allow them to enlarge facility.
-We also encourage you to allow Hurricane Ridge Road to be used for Bicycle special events. This ride would be very popular as a hill climb, or part of an organized tour event. Putting a limit on the use to no more than three times per year would be acceptable.

FAX # 360-457-5380 • www.portangeles.org • E-mail: pangeles@olyopen.com
REPRESENTING THE LARGEST GROUP OF BUSINESSES ON THE PENINSULA

Elwha

-This section is going to be going through major changes in the years to come, as the dams are removed. We like your approach to the growth with the comments in option D

Lake Crescent

-Improving the trail on the North shore of the lake would be great. We need to have another option for cyclists and get them off 101. Of the options we agree most with option D. However we do not agree with increasing the boundaries of the park.

Sol Duc

-The Sol Duc area is very popular and definitely would be used more if it were open for a longer season. Therefore we agree with option C

Ozette

-We agree with option D but only with these adjustments:

*improve Ozette Campground to handle larger RVs with power and water. (no generator use & no longer than a seven day stay)

*Allow nonmotorized and motorized boating. However, we suggest that no wake zones be established to help separate the users, which would allow for a better experience for all, and promote safety.

*Park boundaries stay at current levels

Mora

-We like Option C except we would like the Park to take it a step further. We encourage ONP to do a land swap to allow Quileute Tribe to have access to some higher land, and ONP have an official trailhead and defined access to second beach. This would make a much better trailhead and also allow the tribe to have a safe haven during severe storms.

Hoh

-We agree with the ideas proposed in option D

Kalaloch

-This area definitely needs upgrading. It has much more potential if the facilities were improved. Therefore we agree with option D

Queets

-We would like the Park to pursue option C

Quinault

-The improved trail and biking opportunities in C would be very welcome. This option would increase the visitor access and make the area more of a destination. We encourage option C.

Staircase

-Agree with option D

Dosewallips

-Agree with option D

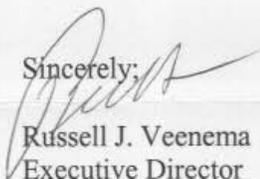
Deer Park

-The Deer Park area in Park history was a much higher use than now. We would like to see this area grow and we feel the options of C would allow this to happen best.

Wilderness

-Olympic National Park is known for the wilderness areas that are so prevalent. Keeping wilderness as a big part of the Park experience is important to us all. Therefore we agree with option D except no boundary adjustment.

Sincerely;


Russell J. Veenema
Executive Director
Port Angeles Regional Chamber of Commerce

Comment 316-Public Employees for Environmental Responsibility



190793-316

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P.O. Box 2618 • Olympia, Washington 98507
Phone and Fax: (360) 528-2110
e-mail: wapeer@peer.org • <http://www.peer.org/washington>

September 15, 2006

Olympic National Park GMP
National Park Service
Denver Service Center
P.O. Box 25287
Denver, Colorado 80225
olymp_gmp@nps.gov

Dear Denver Service Center:

Public Employees for Environmental Responsibility (PEER) offers the following comments on the Draft General Management Plan/Environmental Impact Statement for Olympic National Park.

GENERAL

The draft GMP is a timid document, unsuitable to guide the park for the next twenty years. The NPS has opted for the "status quo" rather than advancing the protection of one America's great ecological treasures.

To move Olympic National Park into the twenty-first century, PEER suggests that the Draft consider and adopt measures to:

- Reestablish extirpated native wildlife,
- Remove the ski area from Hurricane Ridge, and
- Propose revised boundaries that encompass ecological units.

One of the most fundamental and longstanding National Park Service (NPS) policies is to return to park ecosystems the missing faunal elements where their disappearance is a result of human activity. For example, Olympic once contained wolves. Few areas of the national park system are as fit by topography, configuration and wild character for a wolf population. PEER's request is nothing revolutionary or extreme. The GMP should consider the matter.

Downhill skiing is an infrastructure-intense recreation that has no place in areas of the national park system. Only a few such areas remain. Other parks have eliminated them (e.g. Rocky Mountain and Lassen Volcanic National Parks). PEER acknowledges that

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current NPS Management Policies allow the continuation of the few existing ski areas that remain in parks. But that does not mean that the NPS cannot propose to phase out the ski area at Hurricane Ridge. Such an action is the environmentally preferable course, allowing the restoration of disturbed and cleared areas, and reducing winter traffic.

PEER endorses the Draft alternative to propose boundary adjustments in certain critical areas of the park. PEER advises that the proposed revisions approximate more closely to watersheds and ecologically manageable units such as those displayed in Alternative B (P. M58). PEER urges that the NPS include the boundary revision along the Quinault River as one of the most essential to provide enhanced management and protection of park resources, namely elk. The NPS Draft position (p. 82) is a perfect example of the timidity that characterizes this Draft. Including the several parcels of private lands within the park boundary, should Congress chose to do so, would still leave the lands private and Congress could limit the NPS power to acquire the lands without the consent of the owner. There may come a day in the twenty year span of the GMP, when willing owners may come forth.

In short, GMPs are not written only for today's circumstances but for the possibilities of tomorrow. The Draft GMP for Olympic does not look into that future but timidly avoids potential "difficulty." (p. 82).

SPECIFIC COMMENTS

1. Indian Treaty Rights (pages 12, 133-136)

PEER appreciates the thorough, and largely accurate, description of treaties with Tribes that border Olympic National Park. The treaties provide for extant rights and privileges, some of which endure within the Park. However, the Draft's extensive discussion avoids two treaty issues.

a. Quinault Tribal Hunting

The Quinault have asserted, and will no doubt continue to assert, the right to hunt wildlife in the Park. PEER knows that if we fail to comment on this issue, then certainly the Quinault Tribe will. The NPS twice states forcefully (pp. 12 and 133) that the Stevens' Treaties "right to fish at all usual and accustomed grounds and stations" has been adjudicated and upheld in the Federal courts. The Draft fails to state that the Federal Courts have also adjudicated the nature and extent of the Quinault right to hunt, albeit at a lower level than the fishing rights decisions.

In 1982 two members of the Quinault Tribe killed an elk in the Queets corridor of the park. The Indians claimed a treaty privilege to hunt for elk on open and unclaimed land under the Treaty of Olympia.¹ In 1938 Congress reserved the open and unclaimed Federal lands as Olympic National Park.² In 1942 Congress prohibited "[A]ll "killing,

¹ July 1, 1855

² President Theodore Roosevelt reserved the area as a "national monument" in 1909. Arguably, the lands were no longer open and unclaimed as of then. However, the 1909 proclamation did not ban hunting on the Forest Service-administered monument.

wounding, or capturing at any time of any wild bird or animal..." within the confines of the Park.³ In 1984 the U.S. District Court found that the Quinault privilege to hunt on their ceded lands in the park no longer existed. The court reasoned that the hunting privilege, if it did not cease when the lands were reserved as a park in 1938, certainly ceased when Congress banned hunting in the park. "It is not logical to give the hunting privilege set forth in the treaty superior force in the face of the purpose for the creation of Olympic National Park..."⁴

The court examined whether the creation of the park in 1938 and the 1942 ban on hunting abrogated the Quinault treaty privileges. The court found no abrogation of the Treaty.⁵ The court did not need to find abrogation to determine that the hunting privilege had ceased. Instead, the court described the Quinault privilege to hunt (among other privileges) as "self-limiting," i.e. limited by the treaty's "open and unclaimed lands" provision. In contrast, the court pointed to the absolute Quinault treaty right to fish at usual and accustomed places and found that the fishing right survived the creation of the park. The fishing right survived because Congress showed no intent to prohibit fishing in Olympic. The act establishing Olympic allows fishing. The court stated only "...an absolute right, when encroached, requires specific abrogation." The Quinault right to hunt, the court held, was not an absolute right, but one limited by its own terms to "open and unclaimed lands."

In sum, the Quinault privileges to hunt in Olympic National Park ended when the lands were withdrawn from disposal and reserved for park preservation purposes; purposes with which hunting is incompatible.

b. Makah Rights to Whale and Seal

The Draft mentions (pp. 12 and 133), that the Makah Tribe retains the treaty right for "whaling and sealing at usual and accustomed grounds and stations." The Draft, to its credit, avoids conflating this right with the distinct and separate "right to fish." The latter right has been upheld in courts. The nature and extent of the Makah right has not been. The Ninth Circuit Court has thus far refused to decide the issue of abrogation of the whaling and sealing right by the Marine Mammal Protection Act.⁶

In 1855 the United States and Makah Tribe concluded the Treaty of Neah Bay.⁷ Article 4 of the Treaty guarantees that "[T]he right of taking fish and of whaling or sealing at usual and accustomed grounds and stations is further secured to the Indians in common with all citizens of the United States, and of erecting temporary houses for the purpose of curing, together with the privilege of hunting and gathering roots and berries on open and unclaimed lands: Provided, however, That they shall not take shell-fish from any beds staked or cultivated by citizens."

³ 16 U.S.C. 256b.

⁴ U.S. v. Hicks, 587 F. Supp. 1162, W.D. WA. (1984).

⁵ "Termination of the Indian hunting privilege on Olympic National Park lands does not constitute abrogation."

⁶ Anderson v. Evans (2002)

⁷ January 31, 1855

The Treaty of Neah Bay does not define “usual and accustomed” grounds and stations where the Makah retained the right to take fish, whale or seal. The GMP does not decide the issue and it is best left alone.

This issue is relatively minor for Olympic National Park. Because the park boundary extends only to the lowest low tide line (i.e. places where whales are not usually found) the exercise of the Makah rights, whatever they may be, is unlikely in the Park. While the same is not true for seals, there is, to our knowledge, no incident of Makah sealing in the waters, or littoral areas of the Park.

To be complete, the Draft should state that the nature and extent of the Makah right to whale and seal has not been adjudicated. Nor has there been any determination that all or portions of the Olympic National Park coastal strip are “usual and accustomed grounds and stations” in the meaning of the Treaty of Neah Bay.

As for the third proviso of the Treaty that the Makah have the privilege of hunting and gathering roots and berries on open and unclaimed lands – this proviso is made inoperative by the same reasoning applied by the Federal court in the Quinault hunting decision. Again, to the best of our knowledge, Makah hunting has not been an issue in the Park.

2. Wild and Scenic Rivers

PEER believes it is essential that park evaluates and recommends all 14 rivers emanating from wilderness for Wild and Scenic River designation in the GMP. The fact that only one river was recommended in the draft is yet another indication of the Park’s timidity in proposing appropriate protections for the resources. Since the new GMP would provide guidance for the park for the next twenty years and because the Park refuses to move forward with a Wilderness Management Plan it is absolutely necessary that the designation of all thirteen rivers be address in the current GMP.

The Wild and Scenic River Act requires evaluation in planning processes:

“In all planning for the use and development of water and related land resources, consideration shall be given by all Federal agencies involved to potential national, wild, scenic and recreational river areas, and all river basin and project plan reports submitted to the Congress shall consider and discuss any such potentials. The Secretary of the Interior and the Secretary of Agriculture shall make specific studies and investigations to determine which additional wild, scenic and recreational river areas within the United States shall be evaluated in planning reports by all Federal agencies as potential alternative use of the water and related land resources involved.” (Section 5(d)(1).

The 2001 National Park Service Management Polices are also clear that:

“Potential national wild and scenic rivers will be considered in planning for the use and development of water and related land resources. The Service will compile a complete listing of all rivers and river segments in the national park system that it considers eligible for the national wild and scenic river system. ...A decision concerning whether or not to seek designation will be made through a GMP, or an amendment to an existing GMP, and the legislation review process.” (Section 2.3.1.10)

Furthermore, the National Forest Service completed its wild and scenic river assessment of 14 major river systems in the park as part of the Olympic Forest Plan in 1990 but felt it appropriate to let NPS move forward with the final recommendation as these rivers originate in the park.

The resolution of this issue is long over due. We believe all major rivers should be recommended and as Lake Ozette is home to listed sockeye, the Ozette should also be nominated.

We specifically recommend that that GMP include an inventory of the eligibility of all major river systems for inclusion into the Wild and Scenic Rivers System and provides protection of natural river processes and critical fish and wildlife habitat. .

3. Wilderness

Parks like Olympic are tasked with the complex job of meeting a variety of mandates designed to protect diverse and valuable resources. At Olympic one of the many challenges involves cultural resources within designated wilderness. Fitting together the two obligations of cultural and wilderness preservation is exceptionally complex.

The Draft GMP fails to meet the mandate of the Wilderness Act. Instead, the Draft GMP consistently places cultural resource programs higher than the obligation to preserve wilderness character. The GMP takes the extreme position that cultural resource programs automatically trump wilderness mandates. The GMP only allows that when the NPS carries out the cultural resource program, the NPS will use “methods that are consistent with the preservation of wilderness character...” (e.g. see p. 26). But the GMP presumes that the cultural resource program itself takes precedence over wilderness character (i.e. only the “means” of implementation are subject to wilderness scrutiny but not the program itself).

Olympic, of all parks, should know that the NPS must scrutinize cultural resource objectives with a close eye on the Wilderness Act mandates. A Federal judge rebuked Superintendent Laitner and Regional Director Jarvis for degrading wilderness character for the sake of preserving the historic scene, by attempting to install two new structures. The judge found that the NPS was in violation of the Wilderness Act.⁸

⁸ Olympic Park Associates v. Mainella, Jarvis and Laitner (U.S. District Court, W.WA. (July 29, 2005))

If the Draft GMP is any indication, the NPS officials seem to have learned nothing from their defeat in court. For the Draft GMP posits the same legally flawed premise that historical considerations take precedence over wilderness character. This troubling behavior indicates more than an intellectual disagreement (for which there is ample room!). Rather, the Draft GMP displays a stubborn and childish insistence on the same practices that a Federal court has already found illegal.

PEER is not just criticizing the Draft. We specifically request the NPS reconsider the Draft and appropriately address the complex task of managing and preserving cultural resources in park wilderness. Here are two fundamental statements on which we can agree and that can lead to an improved, unbiased GMP.

a. "There is room in wilderness for historic structures."

In the early 1970's, as the NPS was completing a series of wilderness reviews for proposal to the Secretary, questions arose whether the proposals needed to excise structures of historical value from the boundaries.

In a letter of June 10, 1974 from the Office of the Secretary to Senator Henry Jackson, Chairman of the Committee on Interior and Insular Affairs the Secretary's office makes clear that "structures of historical value need not be carved out of wilderness areas. A recommendation to include such a structure in wilderness would be based on two criteria: (1) the structure should be only a minor feature of the total wilderness proposal; and (2) the structure will remain in its historic state, without development."

Olympic contains a number of historic structures now within wilderness. The Draft points out that the 1974 EIS for the Olympic wilderness proposal "affirmed that the historic properties in the park would not be adversely affected by wilderness designation." (p. 118). The statement is both consistent and contemporary with the letter from the Secretary's Office to Senator Jackson.

PEER does not advocate the removal of historical structures from Olympic wilderness. PEER does not advocate that the NPS cease maintenance or preservation of existing structures. PEER advocates that the GMP make clear that the NPS will not develop, and thus destroy the historic state of, such structures in wilderness. Such an action would contravene the Wilderness Act. Note as well, that some of the historic structures in wilderness (ranger stations, fire lookouts, etc.) are NPS administrative facilities that may also be justified not only by their historical worth but as necessary for administration of the wilderness area.

b. "There is room in wilderness to protect archaeological resources"

Many designated wilderness areas contain archaeological sites; places like Bandelier National Monument, whose wilderness was designated in 1976. More recently, Congress established the El Malpais National Monument and National Conservation Area

in New Mexico in 1987. The House Committee Report for that law asserted that in wilderness generally, it is permissible to undertake “active measures for the conservation and interpretation of archaeological and historical resources, as well as the scientific use of such resources.”⁹ The archaeological sites at Olympic do not trouble the Wilderness Act. Thus, PEER does not advocate that the NPS must cease research, investigation, conservation or interpretation of archaeological resources.

Trailside shelters

Trailside shelters are more complicated. From the very beginning, the NPS understood that the Wilderness Act generally did not allow for trailside shelters. The 1966 NPS Wilderness Management Criteria provide that “trailside shelters may be permitted where they are needed for the protection of wilderness values.”¹⁰ The Draft GMP does not argue for shelters as administratively necessary for protecting park wilderness. The Draft GMP lists “shelters” among the “historic properties in the park” (p. 118). As “historic structures” shelters may remain in wilderness and the NPS may maintain them.

This brings our comments to the issues raised in our successful litigation over the shelters at Home Sweet Home and Low Divide. First, the Draft GMP fails to make any mention of how this Federal court decision in Olympic Park Associates v. Mainella affects wilderness management. Second, we get the distinct feeling that the NPS considers the case to have been wrongly decided and thus safely ignored.

The Draft GMP illustrates both traditional NPS stubbornness and a biased approach to the wilderness-cultural resource issue. The two structures that the NPS proposed to install trailside at Home Sweet Home and Low Divide were NOT historic structures. They were built in the park maintenance yard in 2002. The NPS proposed to install them to replace original shelters that were historic but that the NPS had allowed to collapse under winter snows in 1998. The NPS justified the new structures in wilderness because they would contribute to the Park’s effort “to maintain the historic feeling and appearance of the park trail system.”

c. “Restoring historic feeling and appearance is impermissible in wilderness.”

There is no law nor policy to which the NPS can point that either mandates or permits the NPS to manage wilderness designated lands to create, reestablish or perpetuate “historic feeling and appearance” at the expense of wilderness character. The restoration of a “historic feeling and appearance” on a landscape is as antithetical to wilderness preservation as is imaginable.

The Wilderness Act defines “wilderness” as “undeveloped Federal land...managed so as to preserve its *natural conditions*...” (emphasis added). Further, the Act requires that each Federal agency “shall be responsible for preserving the wilderness character of the area and shall administer such area for such other purposes for which it may have been established as also to preserve its wilderness character.” This legal requirement means more than simply the NPS will only use **methods** that are consistent with preservation of

⁹ House Rep. 100-116, 100th Cong., 1st Sess. 12

¹⁰ This sentence also appears in the NPS Administrative Policies, 1970, page 57.

wilderness character. This requirement means that the NPS must refrain from destroying the wilderness character by creation of artificial, i.e. human-created, landscapes to perpetuate “historic feeling and appearance.”

The notion of perpetuating manmade landscapes in wilderness finds no support in the history of the Wilderness Act or of early understandings of the Act. Historic structures have a place in wilderness, as discussed by the officials in the early 1970’s and described earlier in our comments. In contrast, there is no such support for maintaining “historic feeling and appearance” of landscapes in wilderness.

We must point out that this is not only our comment but the position of a Federal court. It is a decision that governs the NPS, and within which the GMP must operate. The court instructed the NPS, “[Once] the Olympic Wilderness was designated, a different perspective on the land is required. Regarding the Olympic Wilderness, that perspective means “land retaining its primitive character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions.”¹¹

It is an extreme position for the NPS to argue that “historic feeling and appearance” trumps wilderness character.

Relationship of the Wilderness Act to the Organic Act

a. No Repeal of NPS Statutory Authority

The Wilderness Act provides that “[N]othing in this Act shall modify the statutory authority under which units of the National Park System are created.”¹² The Organic Act charges the NPS to conserve, among other things, “historic objects.” The Wilderness Act does not modify or repeal that fundamental part of the NPS mission. PEER does not object, as we stated above, to conserving “historic objects” in the wilderness of Olympic National Park.

b. No Lowering of Standards for Park Preservation

The Wilderness Act also provides that: “Further, the designation of any area of any park...as a wilderness area *shall in no manner lower the standards evolved for the use and preservation of such park...*in accordance with the Act of August 25, 1916, the statutory authority under which the area was created, or any other act of Congress which might pertain to or affect such area, including but not limited to, the Act of June 8, 1906, section 3(2) of the Federal Power Act; and the Act of August 21, 1935.”¹³ (emphasis added)

The Draft GMP quotes this section of the Wilderness Act as if this phrase waives the proscriptions and prescriptions of the Act for all cultural resource programs. (p. 26) It does not! Further, the Draft GMP interprets this section to subordinate requirements that the NPS preserve wilderness character beneath an NPS desire to maintain “historic

¹¹ Olympic Park Associates v. Mainella, Jarvis and Laitner (U.S. District Court, W.W.A. (July 29, 2005))

¹² 16 U.S.C. 1133(a)(3).

¹³ *Ibid.*

feeling and appearance” of landscapes. This is an overly broad and unsupported interpretation of the Act. The NPS advanced this position in court and it failed to persuade. This position is not persuasive in the Draft GMP.

The 1970 Administrative Policies of the NPS explains, in large part, the meaning of this Wilderness Act section. The Draft GMP clumsily asserts 16 U.S.C. 1133(a)(3) as a basis for placing all cultural resource programs above preservation of wilderness character.¹⁴ But, the NPS’ own contemporaneous interpretation of 16 U.S.C. 1133(a)(3) provides a very different and more compelling interpretation:

The Wilderness Act of 1964 recognizes, moreover, that all lands which may be included in the National Wilderness Preservation System are not to be managed alike. For example, the Wilderness Act provides for certain multiple uses in wilderness areas of the national forests designated by the act, such as existing grazing; mineral prospecting until 1984 and mining (with authority to construct transmission lines, waterlines, telephone lines, and utilize timber for such activities); and water conservation and power projects as authorized by the President.

No such lowering of park values is contemplated by the Wilderness Act for national park wilderness, since that act provides, in part, that:

*** the designation of any area of any park...as a wilderness area pursuant to this Act shall in no manner lower the standards evolved for the use and preservation of such park* * * in accordance with the Act of August 25, 1916, [and] the statutory authority under which the area was created * * *.

NPS Administrative Policies (Revised 1970), p. 55.

In short, at the time of enactment, the NPS feared that some might view resource development exceptions that applied to national forest wilderness as applicable to wilderness in the national parks. In national parks such activities were, and remain, impermissible except where directly and specifically provided by Congress. Such an interpretation of the Wilderness Act would have the effect of lowering the standard of protection that parks enjoy, perversely so for the lands designated as wilderness.

The “no lowering of standards” provision specifically cites the Federal Power Act, for example. This ensures that the 1921 prohibition on dam building in parks (16 U.S.C. 797) remains unaltered by the Wilderness Act section authorizing the President to allow water development projects in national forest wilderness. (16 U.S.C. 1133(d)(4)). It would be an insidious outcome if dams were prohibited in nonwilderness park areas, but

¹⁴ The Draft applies the need to preserve wilderness character **ONLY** to the methods used to implement a program, but never holds that a given cultural resource program is subject to the same scrutiny!

were viewed as authorized in park wilderness by the Wilderness Act. This is what 'no lowering of standards' means. These words do not justify, as the Draft purports, militant cultural resource (or for that matter, natural resource) programs that destroy wilderness character.

Wilderness Suitability Studies

We endorse Alternative B that proposes wilderness suitability studies for nonwilderness areas near Lake Crescent and Ozette Lake (p. 69).

CONCLUSION

In July 2005, the Federal Court decided that the NPS is not allowed to indiscriminately subordinate the wilderness character of Olympic National Park to cultural resource protection. The NPS decided to install two new trailside shelters in park wilderness, for the purpose of enhancing "the setting, association, and feeling" of historic use. Thus, the NPS placed the value of establishing a feeling of historic use above the values associated with preserving wilderness character. The Court found that the NPS erred.

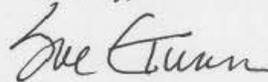
If the NPS believes that the Federal Court wrongly construed the operation of the sometimes-conflicting mandates, then the NPS should have appealed the decision in hopes of reaching a different outcome. But now, the NPS may not use a GMP as a means of writing new case law.

We recognize, as a matter of law, that:

- the NPS is charged with conserving historic objects, and
- the NPS mission applies in wilderness.

We call upon the NPS to reject the extreme assertion that any cultural resource program automatically trumps preservation of wilderness character, except only as to the means employed to implement the program. As the Court said "[O]nce the Olympic Wilderness was designated, a different perspective on the land is required." Instead of misinterpreting the "no lowering of standards" section of the Wilderness Act to suborn wilderness character to cultural programs, this Draft should employ a more reasoned analysis. That analysis must be consistent with the ruling of the Federal Court; a ruling that the Draft refuses to even acknowledge.

Cordially,



Sue Gunn, Ph.D.
Director

cc: Congressman Norm Dicks
Senator Maria Cantwell
Senator Patty Murray

Comment 528-Seattle Audubon Society

PEPC 191158-528



RECEIVED
OCT - 2 2006
DSC-P

September 27, 2006

Olympic National Park General Management Plan
National Park Service
Denver Service Center
P.O. Box 25287
Denver, Colorado 80225

**Re: Comments on Olympic National Park Draft General Management Plan
Environmental Impact Statement**

To Whom It May Concern:

We are writing on behalf of the 5,400 members of the Seattle Audubon Society to provide comments on the Olympic National Park Draft General Management Plan Environmental Impact Statement. Our organization has advocated for the protection of birds and wildlife throughout Washington State since our founding in 1916. In fact our members were deeply involved in establishing Olympic National Park several decades ago.

Due to the large wilderness area encompassed by Olympic National Park and its recognition as an internationally significant ecosystem, Seattle Audubon is extremely interested in making certain that this park retains the ability to provide adequate habitat for the numerous plant and animal species that exist there. The federally threatened northern spotted owl and marbled murrelet are species of special concern for not only our organization, but also the federal and state wildlife agencies.

Our volunteers have carefully reviewed the four alternatives proposed by the National Park Service. In order to manage the park to leave it "unimpaired for the enjoyment of future generations" as dictated by the NPS Organic Act (16 USC §1), alternative B is the only viable alternative. This alternative, which allows the park to be managed as an ecosystem preserve, will most effectively protect birds and the natural environment. Alternative B calls for a reduction of trails and related facilities, which will provide more opportunities for solitude in the wilderness and would provide a healthy environment in balance with nature, where people enjoy, respect, and care for the natural resources that sustain the community of life.

Alternative B is the only alternative that includes both a river zone and an intertidal reserve zone, as well as a larger primeval zone. These zones are important for the sustainability of birds and other wildlife. In addition, Seattle Audubon endorses the use of alternative transit systems in place of roads, which are becoming increasingly congested. This includes snowcoach use in providing winter access to Hurricane Ridge. We support the notion that current roads should be maintained to support current capacity or less, which may involve relocating or closing roads, either permanently or seasonally. Whatever decisions are made with regard to roads, we strongly believe that additional

roads and road-related facilities should not be added without first completely decommissioning current roads.

Seattle Audubon strongly supports the acquisition of boundary lands (as described in alternative B), including the Lyre River and Boundary Creek land near Lake Crescent, the Ozette Lake watershed, the Hoh floodplain, the Queets watershed, and area near the Quinault River. These lands, as was acknowledged in the Environmental Impact Statement, will protect important elk, trout and salmon habitat. Protection of these areas is especially important given the increase in development and timber harvest which would be detrimental for these and other species. The acquisition of boundary lands such as stream corridors will also provide a buffer to the older growth forests and streams within the Park.

Alternative D, which strives to protect resources and improve visitor experiences, does not place enough emphasis on habitat protection. It states that "natural processes will be promoted, and some previously disturbed areas would be restored..." but does not provide any further details. Moreover, this alternative "might adversely affect spotted owls and marbled murrelets" (see page 88). This is simply unacceptable, particularly given recent population declines of both species.

Alternative C places too much emphasis on accommodating visitors. While visitor access is important, this alternative calls for increased zoning for development to accommodate more visitors. While mass transit is being considered and most wilderness would be designated as primeval, increased development and tourism in the park could be detrimental to the habitat of numerous species; specifically, alternative C "might adversely affect spotted owls and marbled murrelets" (see page 88).

Alternative A is the no action plan, but this plan is not desirable because of the park service's concern that the park faces major user capacity issues (see page 74). The no action alternative does little to alleviate pressures on resources from increased visitor use of the park.

Therefore, we strongly urge you to implement alternative B, as it includes a larger primeval zone and is the only alternative to include a river zone. This alternative reduces the amount of visitor facilities and opportunities during peak use periods, but provides higher quality visitor experiences while also sustaining wildlife habitat.

Thank you for accepting our comments. Please feel free to contact me if you have any questions.

Sincerely,



Alex Morgan
Conservation Director

Comment 593-Seqium-Dungeness Valley Chamber of Commerce

PEPC 191255-593

SEP-29-2006 12:18P FROM: SEQUIM CHAMBER 360168316349 TO: 13339692736 P. 1/3

SEQUIM-DUNGENESS VALLEY



CHAMBER OF COMMERCE

P.O. Box 907, Sequim, Washington 98382-0907
Telephone: (360) 683-6197 Fax: (360) 683-6349
info@cityofsequim.com www.cityofsequim.com

FACSIMILE TRANSMITTAL MEMO

TO: DNP
COMPANY: Carla McConnell
FAX: 303-969-2736
DATE: 9.29.06

NO. OF PAGES: 3
FROM: Laanan
COMPANY: Sequim Chamber
FAX: 360-683-6349
PHONE: 360-683-6197

Carla McConnell
Olympic National Park-GMP
National Park Service
PO Box 25287
Denver, CO. 80225

Dear Ms. McConnell:

These comments in reference to the General Management Plan are the opinions from the Sequim-Dungeness Valley Chamber of Commerce Executive Committee of the Board of Directors. We hope you find our observations helpful. We are working in conjunction with the Port Angeles Regional Chamber of Commerce and the Joint Marketing Cooperative of the Olympic Peninsula. We generally pool our resources and expertise, although some differences may be evident in our recommendations. Please be assured that all of these organizations welcome the opportunity to evaluate your plan, and want to be involved. Your Park is very important to us and we want to remain involved.

Headquarters, ONP Visitor Center & Heart of Hills

-We would suggest you focus on Option D. We receive many requests for better public transportation to and within the park. This option seems to help in this area. However we suggest you not only keep Heart of the Hills Campground but expand it to make it more user friendly for larger RVs, and also offer RV hook ups with water and power.

Hurricane Ridge & Obstruction Point

-Option C appears to be the best choice here. Hurricane Ridge is a universally popular tourist destination, one which is relatively easy for the motorized tourist to access and see the broad vistas of the Park. If the road were to be open more often and more consistently would be a big plus to our community. With that in mind we would like to see better snow removal for the ridge road with the opportunity for alternative transportation access. Also allow for significant upgrades of ski area facilities. Recommend putting ski area operations out to bid for a private developer and allow them to enlarge facility.

-We also encourage you to allow Hurricane Ridge Road to be used for Bicycle special events. This ride would be very popular as a hill climb, or part of an organized tour event. Putting a limit on the use to no more than three times per year would be acceptable.

Elwha

-This section is going to be going through major changes in the years to come, as the dams are removed. We like your approach to the growth with the comments in option D

Lake Crescent

-Improving the trail on the North shore of the lake is an important step. We need to have another option for cyclists and get them off 101. Of the options we agree most with option C. Lake Crescent is known as a unique tourism destination and better access would benefit the visitor. Improvement of facilities and the trail system is important, however we do not agree with increasing the boundaries of the park.

Sol Duc

-The Sol Duc area is very popular and definitely would be used more if it were open for a longer season. Therefore we agree with option C

Ozette

-We agree with option D but only with these adjustments:

- *improve Ozette Campground to handle larger RVs with power and water.

- *Allow nonmotorized and motorized boating.

However, we suggest that no wake zones be established to help separate the users, which would allow for a better experience for all, and promote safety.

- *Park boundaries stay at current levels

- *Explore partnerships to acquire land easements to protect fisheries and the water quality of the lake

Mora

-We like Option C except we would like the Park to take it a step further. We encourage ONP to do a land swap to allow Quileute Tribe to have access to some higher land, and ONP have an official trailhead and defined access to second beach. This would make a much better trailhead and also allow the tribe to have a safe haven during severe storms.

Hoh

-We agree with the ideas proposed in option D

Kalaloch

SEP-29-2006 12:19P FROM: SEQUIM CHAMBER

360168316349

TO: 13039692736

P. 3/3

Queets

-We would like the Park to pursue option C

Quinault

-The improved trail and biking opportunities in C would be very welcome. This option would increase the visitor access and make the area more of a destination. We encourage option C.

Staircase

-We agree with option C with the following suggestions.

-Access to the park would be improved for year-round use, if feasible, with the U. S. Forest Service.

Dosewallips

-Agree with option D

Deer Park

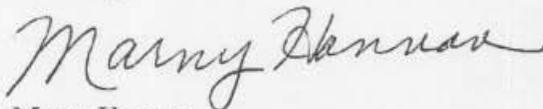
-The Deer Park area in Park history was a much higher use than now. We would like to see this area grow and we feel the options of C would allow this to happen best.

Wilderness

-Olympic National Park is known for its wilderness areas. We believe that by making that wilderness just a little more accessible to the ordinary visitor that the wilderness experience will be shared with a wider audience. Therefore we agree with option C with no boundary adjustment.

-As you will note, we are asking for no boundary adjustments. We support and respect the economic impact of the timber companies' activities in these areas.

Sincerely,



Marny Hannan
Executive Director
Sequim-Dungeness Valley Chamber of Commerce

Comment 449—Society for American Foresters, North Olympic Chapter of American Foresters

PEPC 190947-449

COMMENTS FROM THE NORTH OLYMPIC CHAPTER OF THE SOCIETY OF AMERICAN FORESTERS ON THE DRAFT GENERAL MANAGEMENT PLAN FOR THE OLYMPIC NATIONAL PARK

Gordon Gibbs, Chair

September 26, 2006

The mission of the Society of American Foresters is to advance the science, education, technology, and practice of forestry; to enhance the competency of its members; to establish professional excellence; and, to use the knowledge, skills, and conservation ethic of the profession to ensure the continued health and use of forest ecosystems and the present and future availability of forest resources to benefit society.

The SAF North Olympic Chapter opposes the proposed boundary expansions and the purchase and exchange of 44,000 acres of forestland. Following are some of the mission conflicts that we expect under ONP management:

As new in holders, private forest landowners will be strongly compelled to become "willing sellers."

The Wilderness mandate of the ONP will disallow the timber harvest that is important to the continued health and use of the forest ecosystem. We view sustainable timber harvest as an ecosystem use that will be limited or eliminated.

The Wilderness mandate of the ONP will eliminate the active fish and wildlife habitat and water quality activities that are now and will continue to be done under the State of Washington Legislation. The ONP preservation ethic conflicts with the SAF conservation ethic and restricts our ability to ensure the continued health and use of the forest ecosystem.

Use of these lands will effectively be restricted to a very narrow class of people for non-consumptive activities. This conflicts with the present and future availability—to everyone—of forest resources.

Most of the Olympic Peninsula is already in federal ownership and is managed only for ecological services.

Our communities and families are very dependent on the sustainable and active timber harvest from the land that the ONP will eventually purchase.

Comment 435-Washington Forest Protection Association

190933 -435

September 27, 2006

National Park Service
Denver Service Center
P.O. Box 25287
Denver, CO 80225

Re: Olympic National Park Draft General Management Plan

Dear Park Service:

Thank you for the opportunity to submit comments regarding the Draft General Management Plan for the Olympic National Park.

The Washington Forest Protection Association (WFPA) is a private trade association representing many private forestland owners in Washington State. WFPA has worked collaboratively with federal, state and local governments, as well as tribes, environmental organizations and other forestland owners, over the last decade to ensure that forest practice activities conducted under the state forest practices rules meet the needs of salmon and clean water.

In June 2006, the U.S. Departments of Interior and Commerce granted Incidental Take Permits to the state under the Forest Practices Habitat Conservation Plan, recognizing that forest practices activities in Washington State meet the needs of the Endangered Species Act for aquatic species. Not only does this historic agreement have the approval of the Departments of Interior and Commerce, it also has the full support of the state's Congressional Delegation and a 2/3rds majority bi-partisan support of the state Legislature.

Therefore, we respectfully request the National Park Service, also a part of the Department of Interior (DOI), to reject your preferred alternative of expanding the park boundary to include private forestland, and instead analyze the alternative without including private forestland within the park boundary.

We also respectfully request that you either remove or modify references in the draft EIS to the following comments regarding logging:

Pages 202, 237, 276 and 313: "Logging operations near park boundaries create noise that detracts from natural soundscapes in the park." The level of sound and distance traveled would not cause noticeable detractions from natural soundscapes. Your document lacks the research and science to make this statement.

Pages 203, 239: "...unpaved roads outside the park (e.g., logging roads) near rivers and streams can result in increased erosion and sedimentation. These action adversely affect

the movement of water through floodplains and disrupt the natural processes of wetlands and riparian areas, causing long-term adverse impacts.” Logging roads on private forestlands are managed under the Forest Practices Habitat Conservation Plan (HCP). The HCP includes a program that requires a well-designed, located, constructed and maintained system of forest roads that protect streams and water quality. The HCP, through the state’s forest practices rules, ensures that stream banks are protected from erosion, the amount of sediment entering streams is limited, fish passage to upstream habitat is ensured, construction of new roads is minimized, and thousands of miles of unnecessary roads will be removed or abandoned. Private forest landowners are required to develop a Road Maintenance and Abandonment Plan which inventories forest roads within their ownership, assess current road conditions, and sets a timetable for necessary repairs or abandonment. To date, more than 8,400 road plans have been completed, covering more than 58,000 miles of roads, and 775 miles of stream habitat has been reopened by removing blockages to fish passage.

Pages 207, 243, 282, 319: “Logging activities, especially after the wide use of mechanical cutting methods, have had a major adverse effect on mature (old-growth) forests... These actions have had moderate to major adverse impacts on native vegetation communities in the region.” There is no science in your document supporting this claim.

Pages 209, 246, 283, 285, 320, 322: “On the Olympic Peninsula, habitat loss and disruption are the most common reasons for a terrestrial species to become threatened or endangered. Loss and fragmentation of habitat is occurring in the Olympic region as a result of logging, agriculture and urban development.” This statement perpetuates the false impression that forest harvest as part of the managed forest landscape “fragment” habitat. The conclusion of a scientific conference held in 1999 to address fragmentation in relationship to forest management and the consequences for wildlife populations in the forests of the western United States and Canada conclude that the negative effects of fragmentation on wildlife associated with forest land use changes in Midwestern and eastern parts of North America are not apparent in western forests managed for timber production, where older and younger forests are juxtaposed on the landscape.¹ Private lands in the area under consideration for addition to the Park have been under in forest management for more than 100 years. Wildlife assemblages and use patterns have certainly changed from pre-settlement conditions, but that change has taken place and the current managed forest landscape supports a wide variety of habitats and species that is not expected to change as a result of continued sustainable forest management. In fact, habitat complexity is increasing on lands managed under the Washington State Forest Practices HCP as a result of forest practices rules in place since 1976 and the more recent additions to those rules.² The recent Forests and Fish state rule more than tripled the amount of riparian and other set asides² to more than 20% of the landscape in areas with a high density of streams. ‘Logging’ must be removed from this statement.

¹ Rochell, James A., Leslie A. Lehmann and Joe Wisniewski, editors. 1999. *Forest Fragmentation*. Brill Academic Publishers. Boston, Massachusetts.

² Rice, William, WA Department of Revenue. 2002. REPORT TO THE LEGISLATURE Pursuant to Section 402, Chapter 4, Laws of 1999, 1st Special Session, Engrossed Substitute House Bill 2091

Pages 212, 249, 288, 325: "Logging activities as well as the development and expansion of communities near the park have also disturbed archeological resources outside the park boundaries." The Department of Interior's Final Environmental Impact Statement for the Forest Practices HCP, dated January 2006, Chapter 4.13, recognizes the extensive regulatory and voluntary practices private forestland owners operate under in order to protect archaeological, historic and cultural resources. The Washington State Forest Practices Regulatory Program regulates forest practices in the state including forest practices affecting archaeological, historical, and cultural resources on both private and State land. In addition to the regulations, the Cultural Resource Protection and Management Plan, written and agreed to by Timber, Fish & Wildlife participants on July 3, 2003, provides a process to enhance protection of cultural and archaeological sites on managed forestlands. The basic functions of the plan involve largely voluntary actions designed to: foster improved communication and mutual respect between the State, Tribes, and landowners; provide cooperative processes to protect and manage cultural resources; and provide educational opportunities to foster trust, commitment, and understanding. Memoranda of Understanding, signed documents that describe the verbal agreements between landowners and Tribes are cited in the Plan as the preferred pathway to protect cultural resources.

Pages 240, 279, 315: "...the expansion of the park boundary in the Lake Ozette area of the park would result in the restoration and protection of watersheds that flow into the ocean. Reducing the number of existing and maintained roads, and protecting the area from logging, would likely result in decreased sedimentation at the mouth of the Ozette River." These statements are particularly egregious. The state requires that private forestland owners upgrade all forest roads to current state standards by 2016, or sooner if the road is used for hauling of forest products. The Park cannot currently meet its facility and road maintenance obligations and has a backlog of \$43 million, over 10 times the annual maintenance appropriations. Furthermore, the Park has no obligation to complete its backlog of maintenance projects, unlike the Forest Practices Act requiring state and private landowners to complete road maintenance by 2016. The state rules and timelines will result in better road maintenance by private forestland owners than the National Park Service given your current maintenance backlog. As noted earlier, logging roads on private forestlands are managed under the Forest Practices Habitat Conservation Plan which was approved by your own agency. The HCP includes a program that requires a well-designed, located, constructed and maintained system of forest roads that protect streams and water quality. The HCP, through the state's forest practices rules, ensures that stream banks are protected from erosion, the amount of sediment entering streams is limited, fish passage to upstream habitat is ensured, construction of new roads is minimized, and thousands of miles of unnecessary roads will be removed or abandoned. The HCP also includes protection measures that regulate the methods of harvest in these areas. The protection measures include limits on the felling and bucking of timber, and the use of ground-based equipment and cable yarding. Many of these measures are designed to minimize soil disturbance and reduce the potential for erosion and sedimentation.

Additionally, you reference the Forest Practices Habitat Conservation Plan on page 182 of the Draft EIS, and refer to it as a draft plan. It has been finalized and approved as of June 2006. Your EIS should acknowledge the protections put in place for threatened and endangered species in the state of Washington.

Your document also states that “expansion of the park boundary at Ozette could open up privately owned lands to recreational use by park visitors.” (page 263). Your document fails to recognize that private forestland owners do have recreational programs and they do open their lands to the public.

Your criteria for a boundary expansion (a determination that the alternate management and resource protection plans are inadequate) have not been met as it pertains to private forestland. Hundreds of people from state and federal agencies, tribes, scientists, small and large forest landowners and conservation groups have worked for thousands of hours over the last decade to develop cooperative plans to address the impacts of logging and road work on salmon habitat and water quality.

Your document fails to analyze the significant economic impact to individuals and the community of your “preferred alternative,” which would remove 60,000 acres of productive forestland that currently provides a sustainable supply of logs to local mills, jobs, and income to the region. This would result in loss of family-wage jobs and displacement of workers. The 60,000 acres produce approximately 60 million board feet of logs per year, sustainable forever. This volume is about one years supply for any of the modern mill facilities on the north Olympic Peninsula.

Your document grossly underestimates acquisition costs, by at least five times the estimate. Recent transactions of timberland property indicate prices of \$2500 per acre or higher, which translates into \$150,000,000 for 60,000 acres, or over five times the Park’s estimate.

If the Park pursues its proposed boundary expansion over private forestlands, it would impose further regulations on landowners. The Park claims that private land is purchased on a willing buyer/willing seller basis. However, the Park must first expand its boundaries by an Act of Congress to receive federal appropriations then, once the private lands are annexed and included within the Park boundary, an offer to purchase the land would be made. Your document fails to acknowledge that once private forestlands are included within the Park boundary, state rules require that any forest practice application submitted be treated as a Class IV-Special making it much more cumbersome and costly to manage forestlands without additional environmental benefits. Management costs would likely further increase due to pressure from park advocates with interests in opposition to the forestry objectives of landowners. The global market for wood products is very competitive and the Pacific Northwest is already a high-cost supplier of raw material. Cost increases exacerbate the competitive disadvantage and reduce the net value of these lands in the open forestland market place. Action to expand the Park boundary would amount to a de facto taking of private property as landowners find their property

Sincerely,

Bill Wilkerson
Executive Director

Comment 237-Washington Native Plant Society

PEPC 190662-237

Name: Dan & Pat Montague
Organization: Washington Native Plant Society
Organization Type: I - Unaffiliated Individual
Address: 647 73rd Ave NE
Olympia, WA 98506
USA
E-mail: montague30@comcast.net

Correspondence Information

Status: New **Park Correspondence Log:** 190662
Date Sent: 09/22/2006 **Date Received:** 09/22/2006
Number of Signatures: 1 **Form Letter:** No
Contains Request(s): No **Type:** Web Form
Notes:

Correspondence Text

Because the Olympic Peninsula, with Olympic National Park, contains one of the rarest ecosystems in the world, with much more scientific study needed to understand and sustain this unique ecosystem, we urge you keep the developed areas and development zones at their current size as described in Alternative A. We urge you only to allow new recreational developments outside the national park.

We encourage the Park Service to expand park boundaries in the five areas that will protect critical habitats for salmon and wildlife as proposed in Alternative B. (Ozette Lake, Lake Crescent, admn Hoh, Queets and Quinault watersheds)

We believe that River protections zones should be established to ensure that critical salmon habitats and natural river processes are preserved as proposed in Alternative B and we recommend all 13 eligible rivers receive federal Wild and Scenic river designation.

We urge the Park Service to restore those animals such as the wolves and fishers that once were native to the Olympic Peninsula.

Please defer controversial decisions relating to designated Wilderness until a comprehensive wilderness management plan is completed.

Establishment of the intertidal reserves on the Olympic Coast and recommending wilderness study for Ozette Lake are definitely steps in the right directions. Please do no compromise this ecosystem.

Thank you.

Comment 461-Washington Wilderness Coalition

PEPC 190959-461

09/29/06 FRI 14:29 FAX 2066323290

WA Wilderness Coalition

002



Washington Wilderness Coalition

Keeping the Wild in Washington for 25 years

www.washingtonwilderness.org 123 NW 36th Street, # 220 Seattle, WA 98107
info@wawild.org Phone: 206.633.1992 Fax: 206.632.3290

September 30, 2006

Carla McConnell
Olympic National Park — GMP
National Park Service
Denver Service Center — Planning
P.O. Box 25287
Denver, CO 80225

Re: Comments on the Olympic National Park Draft General Management Plan

Dear Planning Team:

On behalf of our more than 10,000 members and supporters throughout Washington State, the Washington Wilderness Coalition (WWC) appreciates the opportunity to submit comments on the Olympic National Park's Draft General Management Plan.

Many of our members hike, camp, horseback ride, raft, climb, ski and view wildlife in Olympic National Park. WWC has worked in the past with citizen activists on the Olympic Peninsula to protect wild forest land and advocated for the park wilderness designations that occurred in 1998. WWC is a 501 (c)(3) non profit organization that has been dedicated to preserving Washington's unique natural heritage for over 25 years.

We appreciate the Park's extension of the comment deadline until September 30. This decision has allowed for citizens and organizations to develop more specific and useful comments on the lengthy document.

We support a number of positive recommendations in the preferred alternative (D) including:

- **Establishment of Intertidal Reserves** – This designation would help address the increasing threats to the critical ecosystems between high and low tides on approximately 35% of the park's coastal portion.
- **Park Boundary Expansions** – The nearly 16,000 acres of proposed boundary expansions would help protect key watersheds and critical wildlife habitat for at-risk species in the Ozette Lake, Lake Crescent and Queets area.
- **Wilderness Suitability Study for Ozette Lake** – We support a wilderness suitability study for the currently non wilderness area around Ozette Lake. Pending the results of that analysis and further Congressional action, the area could be designated as wilderness.
- **Proposed Wild & Scenic River designation for the Elwha River** – We support a Wild and Scenic River designation for the identified segments of the Elwha River.

*The Washington Wilderness Coalition is a 501(c)(3) non-profit organization. All contributions are fully tax-deductible.
Printed on recycled paper.*



We also have a number of specific recommendations about other aspects of the draft plan. Our concerns are as follows:

I. A Wilderness Management Plan for Olympic Park Wilderness Must be Completed

It has now been 18 years since the Olympic Park Wilderness was designated through the Washington Park Wilderness Act of 1988. In that time no wilderness management plan has been developed by the Park. Failure to complete a wilderness management plan is a violation of National Park Service policy.

According to National Park Service Management Policy, each park that contains designated wilderness is required to develop a wilderness management plan every 10 years:

"A wilderness management plan will be completed every ten years by all parks containing wilderness resources for the purpose of providing accountability, consistency, and continuity to the National Park Service's wilderness management program. The requirement to have a current wilderness management plan (or similar plan) applies to all areas containing suitable, study, proposed, recommended, and designated wilderness. (Section 6.3.1; Directors Order # 41)

The wilderness management plan is intended to deal with a variety of important issues including clearly identifying the boundaries of wilderness units of the park; reviewing the status of potential wilderness areas, analyzing specific management actions to be applied to govern public use and protection of the resource in wilderness areas.

NPS policy states that, "the park's wilderness management plan may be developed as a separate document or as an action component of another planning document." (Section 6.3.4.2) The draft general plan includes a number of wilderness related issues (i.e., proposed changes in existing wilderness boundaries, management restrictions on equestrian use) which indicates the Park has appropriately identified that these and other wilderness related issues are long overdue and need attention now. This argues for developing the content of a wilderness management plan as part of this planning process.

We believe a wilderness management plan for Olympic National Park should be developed as part of the current planning process and that development of the wilderness management plan should occur before proceeding to the development of the general plan.

The Park's current practice of deferring wilderness management issues until after the general management plan (which could be another 5+ years) is unacceptable and lacks justification particularly given the fact that 95% of the park is designated wilderness.

II. The Park Service Should Conduct a Full Analysis of all Eligible Rivers for Wild Scenic River Recommendations

Although the preferred alternative recommends two segments of the Elwha River for wild and scenic designation, it fails to analyze or make recommendations for 12 other rivers that have been determined to be eligible. These include the Bogachiel, Ozette, Calawah, Queets,

Dosewallips, Quinault, Duckabush, Skokomish, Gray Wolf, Sol Duc and Hoh Rivers and Royal Creek.

Under the Wild and Scenic Rivers Act, all federal land management agencies, including the National Park Service, are required in their planning processes to study rivers for eligibility in the national system. According to Section 5(d)(1):

"In all planning for the use and development of water and related resources, consideration shall be given by all Federal agencies involved in potential wild and scenic and recreational river areas, and all river basin and project plan reports submitted to Congress shall consider and discuss any such potentials. The Secretary of the Interior and the Secretary of Agriculture shall make specific studies and investigation to determine which additional wild, scenic and recreational river areas within the United States shall be evaluated in planning reports by all Federal agencies as potential alternative uses of the water and related land resources involved."

In addition, the National Park Service's own management policies state that, "potential national wild and scenic rivers will be considered in planning for the use and development of water and related land resources. The Service will complete a listing of all rivers and river segments in the national park system that it considers eligible for the national wild and scenic rivers system." (Section 2.3.1.10)

The Olympic National Forest, in its 1990 forest land and resource management plan, has also determined many of these rivers to be eligible as part of its own studies and analysis (including the Duckabush, Dosewallips, Gray Wolf, Elwha, Sol Duc, Bogachiel, Hoh, Quinault and South Fork Skokomish Rivers). However, since the majority of some of these rivers lies within Olympic National Park (i.e., Hoh, Quinault, Bogachiel, Elwha) the Forest Service has not performed any further analysis and is deferring to the Park Service for any recommendation to Congress to include these rivers in the national Wild and Scenic Rivers system.

Given that the Olympic National Park has not updated its management plan since 1976, and that the next plan revision is not likely for another 20 years, it is essential that these additional river segments be studied and recommended for inclusion in the Wild and Scenic Rivers system in this planning cycle. The combination of detailed eligibility studies conducted by the Forest Service and the Park's own preliminary analysis provide a solid basis upon which to make recommendations as part of this plan revision.

If the Park believes it needs to do further analysis or detailed eligibility studies before it can make recommendations to Congress, it is required to do so as part of this planning process, as noted above. Additionally, the fact that the Forest Service is deferring to the Park Service for any further studies and recommendations to Congress on Wild and Scenic Rivers adds even more urgency to addressing this issue during the current planning process.

III. The Plan Should Address the Status of Potential Wilderness Areas

In November 1988, Congress passed the Washington Park Wilderness Act of 1988 which designated significant acres of wilderness in Olympic National Park as well as about 378 acres of potential wilderness areas. Potential wilderness areas were parcels that possessed significant wilderness character and were intended by Congress to revert to a wilderness designation

without further Congressional action after a particular action (usually an existing use or conflict) was taken.

The Park has an obligation to fulfill the clear intent of Congress and the draft management plan is an appropriate venue to, at a minimum, give a timely update on the status of those potential wilderness acres.

V. Include Pyramid Peak Ridge Wilderness Suitability Study in Preferred Alternative (D)

The Pyramid Peak Ridge area near Lake Crescent was recommended for a wilderness suitability study in Alternative B, but was not recommended for suitability in the preferred Alternative (D). There is little justification for excluding the wilderness suitability study in the preferred alternative. The Park has already indicated that this area has significant wilderness character to merit consideration for a study and it seems that doing that analysis is important.

VI. Remove Reference to Management of Equestrian Use in Wilderness

The following statement occurs in the margin of a chart on page 60 of the draft, "Note: Stock would generally be restricted from some trails and sites and from camping above 3,500' elevation. Some stock use might be restricted to protect native species" (Pg 60). There is no further discussion of this statement. It is not appropriate to indicate what appears to be a new policy governing specific use in wilderness without a careful and deliberate discussion and analysis of rationale. This discussion does not occur anywhere in the draft plan and, consequently, has the effect of raising concerns from equestrian and other user groups about the Park's intentions.

Currently there are stock camps and stock trails above 3,500 feet elevation in the park. If there is an interest in restricting current use for some reason, the Park should deal with that issue in more detail than simply through a single note in the general management plan. If not, the note should be deleted from the general management plan and revisited later.

VII. Plan Should Include Management Options to Restore Extirpated Species Including the Gray Wolf

Gray wolves once roamed the entire Olympic Peninsula until they were systematically hunted, poisoned and trapped into extinction by the 1930s. Since then reintroduction of wolves to Olympic National Park has been suggested at least four times, the most recent of which coming in 1999. The U.S. Fish and Wildlife Service conducted a feasibility study in 1999 which found that there was sufficient prey and habitat to support a population of some 50 or more wolves in the Olympics

The restoration and recovery of previously extirpated species such as the gray wolf should be a future desired condition of the general management plan. The National Park Service's own policies call for the active restoration of listed species:

"...the Service will... undertake active management programs to inventory, monitor, restore, and maintain listed species' habitats; control detrimental

nonnative species; manage detrimental visitor access; and reestablish extirpated populations as necessary to maintain the species and the habitats upon which they depend." (Section 4.4.2.3)

The draft plan fails to address management options associated with the gray wolf. At a minimum, the gray wolf should be included in a future desired condition of the Park. We feel it is also appropriate for the Park to give guidance on how to move forward with restoring the wolf to the Park based on the policy statement noted above.

First hand experience with wolf reintroduction in Yellowstone National Park has taught us that restoring wolf populations to an ecosystem has a number of benefits. Wolves provide a population check on large ungulates such as deer, moose and elk and reduce artificially increased coyote populations that create an imbalance in smaller mammals, like marmots.

Wolf reintroduction has also been shown to provide positive economic benefits to the area. According to John Duffield, an economics professor at the University of Montana, reintroduced wolves in Yellowstone generate about \$70 million in regional benefits.

VIII. Hoh & Quinault Park Boundary Expansions Should Be Included in Preferred Alternative (D)

Proposed Boundary expansions in the Hoh and Quinault watersheds are proposed in Alternative B but not included in the preferred alternative (D). The plan fails to justify why these areas were not proposed for addition.

The plan points out that the Hoh corridor and Quinault parcel proposed for addition to the park in Alternative B would help protect a key flood plain and upland and, "would benefit fisheries in the Hoh River, including the threatened bull trout, and salmon, protecting the physical habitat conditions and water quality." (Pg 371) These parcels are also used by elk herds during the winter for thermal regulation and foraging.

IX. River Zone Protections Should Be Included in Preferred Alternative (D)

We are concerned that the preferred alternative does not include designated river protection zones as in Alternative B. The rivers and riparian areas in the Park provide some of the best remaining habitat for threatened and endangered salmon species. The river zone protections are the only measure in the plan that offers adequate protection for fish habitat and naturally sustainable river systems. These protections should be included in the preferred alternative.

In conclusion, we appreciate the opportunity to comment on the draft management plan and for the extended period in which to comment. While the draft plan puts forward a number of proposals to improve the ecological integrity and long term vision of Olympic National Park (i.e., boundary expansions, wilderness suitability studies), it does not go far enough. Of greatest concern, the draft plan ignores clear Congressional intent and guidance from Park Service policies in a number of cases. Specifically, the plan fails to fulfill the Park's obligation to complete a long overdue wilderness management plan and follow through with recommendations for all eligible Wild and Scenic Rivers and

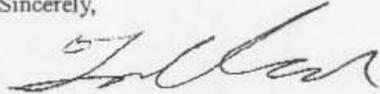
09/29/06 FRI 14:31 FAX 2066323290

WA Wilderness Coalition

007

Thanks in advance for your careful consideration of our comments and we look forward to working with you to improve the management of Olympic National Park.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Uniack", written in a cursive style.

Tom Uniack
Conservation Director

Comment 501-The Wilderness Society

Sent By: THE WILDERNESS SOCIETY;

208 624 7101;

Sep-29-06 7:00PM;

Page 2/3

PEPC 191019-501



THE WILDERNESS SOCIETY

September 29, 2006

Carla McConnell
Olympic National Park GMP
NPS Denver Service Center -- Planning
P.O. Box 25287
Denver, CO 80225

delivered via e-mail and FAX

Re: Olympic National Park General Management Plan DEIS

Thank you for the opportunity for The Wilderness Society to comment on the Draft General Management Plan (GMP) and Environmental Impact Statement for Olympic National Park.

The Wilderness Society is a national conservation organization that works to protect America's wilderness and wildlife and to develop a nationwide network of wild lands. Our goal is to ensure that future generations will enjoy the clean air and water, wildlife, beauty and opportunities for recreation and renewal that pristine forests, rivers, deserts, and mountains provide. These comments are submitted on behalf of The Wilderness Society's 200,000 members. Our organization has worked to protect the public lands in Olympic National Park since 1935 when The Wilderness Society was founded.

Olympic National Park was established because it is truly a spectacular place with ancient forests, cascading mountain streams, essential habitat for wildlife and fish populations, and incredible scenery and vistas. From its coastal strip on the Pacific Ocean, to high alpine meadows and glaciers, Olympic National Park is a special place for many Americans. The U.S. Congress has recognized these significant values and passed legislation in 1988 which was signed into law by President Reagan designating much of the Park into the National Wilderness Preservation System.

Wilderness

The Wilderness Society is concerned that the General Management Plan (GMP) and Olympic National Park personnel are not adequately providing for wilderness protection in the park. There is no wilderness management plan in place despite the fact that the wilderness designation covers most of the National Park and it was designated in 1988, about 18 years ago. On page 26, the GMP states that park staff will develop a wilderness management plan, but on pages 37-39 where there is a discussion of planning efforts and planning documents there is no mention of developing a wilderness management plan. We believe such a wilderness management plan is an essential tool for Park managers, and can provide direction for how best to protect the Park's wilderness, while meeting other land management needs. We urge you to develop detailed plan, with a time table and to make a serious effort for completing a wilderness management plan as soon as possible. The plan and timetable should be clearly discussed and displayed in the final General Management Plan.

Wild and Scenic Rivers

The GMP provides an opportunity to recommend rivers for inclusion into the Wild and Scenic River system thereby providing additional protection for the values these rivers provide. The Wild and Scenic Rivers Act requires federal agencies to study rivers for eligibility in their planning efforts. NPS management policies also require this. The U.S. Forest Service has determined many of the rivers that flow through the Park to be eligible as a result of its own studies, including the Duckabush, Dosewallips, Gray Wolf, Elwha, Sol Duc, Bogachiel, Hoh, Quinault and South Fork Skokomish rivers. However, since the major portion of some of these rivers lies within Olympic National Park, such as the Hoh, Quinault, Bogachiel and Elwha, the Forest Service has not performed any further analysis, and is deferring to the Park Service for any recommendation to Congress to include these rivers in the national system. We urge you to review the eligibility of these rivers and to make recommendations for including these rivers into the Wild and Scenic River system.

The General Management Plan is an important document and will set the direction for how the Olympic National Park is managed for many years. We urge you to recognize the importance of the wilderness values and protection needs of this land, as you develop your final plan.

Please contact me if you would like additional information regarding these comments. Thanks for the opportunity to participate in the planning process.

Sincerely,



Robert M. Freimark

Senior Policy Analyst
The Wilderness Society
720 Third Ave., Suite 1800, Seattle WA 98104

206-624-6430 ext.228
freimark@twsnw.org

Comment 504-Wilderness Watch



PEPC 191022-504

P.O. Box 9175 • Missoula, MT 59807 • p: 406.542.2048 • f: 406.542.7714 • wild@wildernesswatch.org • www.wildernesswatch.org

September 29, 2006

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Counselor

Stewart Udall

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OCT - 2 2006 OCT - 2 2006

DSC-P DSC-P

Carla McConnell
Olympic National Park GMP
NPS Denver Service Center -- Planning
PO Box 25287
Denver, CO 80025

RE: Comments on Olympic National Park General Management Plan DEIS

Dear Wilderness Stewards,

Wilderness Watch submits the following comments on Olympic National Park's General Management Plan (GMP) Draft Environmental Impact Statement (DEIS).

Wilderness Watch is a national conservation organization dedicated to ensuring ongoing protection for the lands and waters within the National Wilderness Preservation System and Wild & Scenic Rivers System. Our mission is to assure that the wilderness character of these special places is preserved and not allowed to diminish over time.

Approximately 95% of Olympic NP is designated wilderness, and 378 acres are designated as potential wilderness. The park also contains a number of rivers that may be eligible for designation under the Wild and Scenic Rivers Act, but that have never been studied for such a recommendation. Our comments on the draft GMP will therefore focus primarily on wilderness and the status of rivers in the park. Our wilderness comments will also highlight the issue of historical structures currently present within the designated wilderness portion of the park.

Wild & Scenic Rivers

While we are pleased that the GMP's preferred alternative (D) addresses potential Wild & Scenic River designation for the Elwha River, we are mystified as to why none of the other free-flowing rivers in the park are addressed. The GMP will provide multi-year management direction for the entire park, so it seems appropriate for such a comprehensive plan to evaluate the qualities and suitability for all rivers in the park, rather than singling out just one while ignoring the others. As a park-wide planning document a GMP should not present a piecemeal approach to the future of the park's many natural resources. What is the rationale for not evaluating the other rivers in this plan?

Wilderness Watch requests that the Final GMP include management direction to evaluate all rivers in the park for possible Wild & Scenic designation, and forward those recommendations forward prior to the next GMP planning cycle.



Wilderness Character

Although the vast majority of the park is designated wilderness, the draft GMP's preferred alternative appears to subordinate that fact in favor of greater emphasis on other aspects of the park, such as new visitor developments and an inordinate emphasis on historic structures in the park. The draft plan contains very little discussion on how various management actions will affect the *wilderness character* of the Olympic Park Wilderness.

Since preservation of wilderness character is the overarching statutory mandate of the Wilderness Act, downplaying the importance of the park's wilderness character is either an intentional oversight or a sign that park staff and the GMP's planners have little grasp of the provisions and intent of the Wilderness Act. While we may sympathize with there possibly being a paucity of technical expertise within the planning team in regard to wilderness, it nonetheless is imperative that the complex qualities and values of wilderness character be fully incorporated into discussions regarding most management actions described in the plan. This may require seeking outside expert assistance with this aspect of the plan, but nonetheless NEPA requires that this major component of the park be fully evaluated in terms of how a variety of proposed management actions may cumulatively affect the area's wilderness character.

Despite the recent court ruling against NPS in *Olympic Park Associates v. Mainella* (2005), the draft GMP indicates that NPS will continue maintaining all structures in wilderness that are eligible or listed on the national historic register. There is no explanation in the plan as to how this fits with the Wilderness Act.

In 2005 the court ruled against NPS because the Wilderness Act does not allow maintaining and replacing structures in wilderness, the ruling was *not* based on the fact that the Low Divide and Home Sweet Home shelters were newly-constructed pre-fabs. New or old, the Wilderness Act does not allow maintaining structures in wilderness unless they are the minimum necessary for administration of wilderness. The structures identified in the draft GMP do not meet that test.

Furthermore, in the 2005 decision, the court pointed out that the National Historic Preservation Act does not require physical maintenance and retention of historic structures, it only requires that the historical value of such structures be recorded. Olympic NP was classified as a national *park*, not as a national *historic site*. And, as the 2005 court ruling notes, the wilderness classification places an additional new overlay on the landscape and the values that NPS is obligated to preserve at Olympic NP and Wilderness. Old pioneer structures and "historic landscapes" are not on an equal footing in terms of NPS' statutory obligations at Olympic, and have no primacy over NPS' obligation to preserve the natural environment and wilderness character of the area.

We therefore hope to see some major changes in the Final GMP in regard to greatly expanding the plan's emphasis on wilderness protection and a substantial modification to the draft plan's incorrect over-emphasis on maintaining evidence of historic human settlement and modifications of the natural landscape.

New Developments

Wilderness Watch questions the expanded developments proposed for non-wilderness portions of the park, including substantial increases in the number of developed front-country campsites. The draft plan provides no compelling reason for most of the new developments. Most, including additional campground space, is best provided by communities outside the park. Indeed, NPS' new management policies place increased emphasis on coordinating with gateway communities. Instead of using taxpayer dollars to further develop the park, it would benefit local communities to have the economic opportunity to provide such services and amenities.

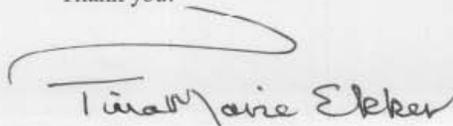
Although it may be true that visitation has substantially increased over the years, it is not desirable for the park to pave over and develop the park's natural landscape to accommodate increased use. Accommodations for increased visitation are most appropriately pursued outside the park. If the park cannot readily handle current or expected future levels of day-use or backcountry visitors, then the park should consider placing limits on daily visitation, rather than further develop the park to accommodate it. Daily limits are not unheard of -- many parks have overnight camping limits on certain trails, and the McNeil River in Alaska has limits on how many visitors per day are allowed for the popular bear-viewing experience.

Preserving the unique values and special experience of our parks is NPS' core mission, not accommodating and catering to unlimited numbers of visitors. NPS' new management policies re-affirm this central mission.

Conclusion

Please notify Wilderness Watch of any further opportunities to comment on the future management direction of Olympic National Park. We look forward to receiving the Final GMP. If you would like to discuss any of our comments or concerns please don't hesitate to contact us at 406-542-2048.

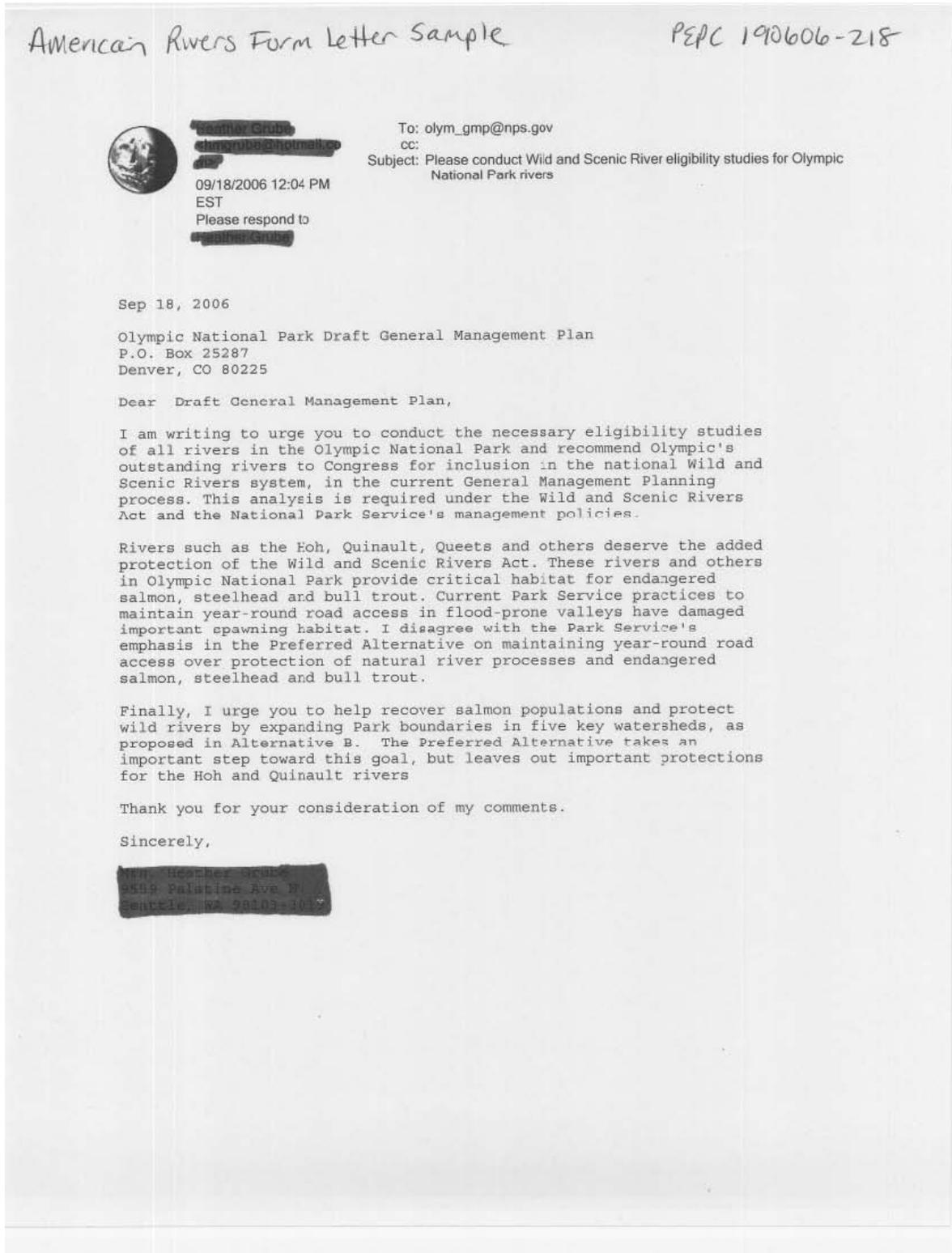
Thank you!



TinaMarie Ekker
Policy Director

Petitions and Forms

Comment 218-American Rivers-Form Letter-250 Received



Comment 391-Backcountry Horsemen-Petition-79 Signatures



BUCKHORN RANGE CHAPTER
BACKCOUNTRY HORSEMEN OF WASHINGTON
P.O. Box 845, Chimacum, WA 98325

PEPC 190882-391

RECEIVED
Sept
AUG 11 2006

DSC-P

Cliff Hawkes
Olympic National Park - GMP
National Park Service
Denver Service Center - Planning
P.O. Box 25287
Denver, CO 80225

September 4, 2006

The Buckhorn Range Chapter of the Backcountry Horsemen is based on the northeast side of the Olympic Peninsula. Most all of our members who weren't born here are local residents who settled in the area at some time in their lives due to their profound love for the Olympic Peninsula, and more explicitly, the Olympic National Park and Olympic National Forest. It is not easy to live here economically, and it is only with sheer determination and commitment that we remain a presence on this spectacular corner of the continental United States. We work hard - and we recreate with the same effort. We are outdoors men and women. We ride, pack, and sleep in and along the mountains we love. We also invest with volunteer labor back to keeping trails and facilities open to everyone.

We are reviewing the draft General Management Plan. Countless phone calls and discussions have been circulating between us on about what the future of stock use on the ONP should be. Writing formal comments is not an easy matter for packers and trail riders. Many don't feel anywhere near as comfortable reviewing a 400 page document and putting together technical comments as we feel at ease with subjects like proper saddle fitting and clearing logs off trails.

However, the message that we all feel needs to be given is the same one. We want the Olympics to remain open to horses and pack stock. We want that for ourselves, and we want it for future generations of horse riders who will enjoy the same Olympic Mountains that brought us to this part of the world. Horses have played a pivotal role in our nation's history. Help us maintain that tradition by keeping it alive - not just in archives, antique pictures, and buried in pages of a document - but preserved in day to day life on the Olympic Peninsula.

Attached are signatures of support.

Sincerely,

JEFF CHAPMAN
Jeff Chapman,
Director, Buckhorn Range Chapter BCHW

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**COMMENT SUBMITTED ON THE OLYMPIC NATIONAL PARK
DRAFT GENERAL MANAGEMENT PLAN**

We request that all trails that are currently in the Olympic Park Wilderness that are open to horses should remain open to horses in the ONP General Management Plan and not be zoned as either Primitive Wilderness Zone or Primeval Wilderness Zone. All such trails should be classified in the Wilderness Trail Zone and remain accessible to stock use.

PRINTED NAME	SIGNATURE	ADDRESS / EMAIL
Juelie Dalzell	<i>Juelie Dalzell</i>	PO Box 672 Port Townsend 98368
MARY ANN MERRILL	<i>Mary Ann Merrill</i>	PO Box 830 0' St, Port Townsend 98368
JAM A. MERRILL	<i>JAM Merrill</i>	830 0' St Port Townsend WA 98368
JEFF CHAPMAN	<i>JEFF CHAPMAN</i>	640 CAPE GEORGE RD P.T. WA
BOB HOYLE	<i>Bob Hoyle</i>	1912 W. VALLEY RD CHIMACUM, WA chimacumbob@earthlink.net BCHC - High Sierra Chapter Sequoia Natl Park
Don & Teriz Maskey	<i>Don Maskey</i>	BOX 959, 3 RIVERS CA 93271
George W. Yeager	<i>George W. Yeager</i>	
Johanna K. Yeager	<i>Johanna K. Yeager</i>	18341 - 9711 AVENUE, Poulson WA 98370
DON SCHOENECKER	<i>Don Schoenecker</i>	2481 ANDERSON LAKE ROAD LOT 131 CHIMACUM, WA 98325
#BARBARA		
Tom Greene	<i>Tom Greene</i>	5356 RUBY BAINBRIDGE
Betsy Greene	<i>Betsy Greene</i>	5356 Ruby PL NE Bainbridge WA 98110
ANN MECKENBUEHL	<i>Ann Meckebuehl</i>	14855 SE 10th PL BELLEVUE WA 98007
Linda Howells	<i>Linda Howells</i>	14855 SE 10th PL Bellevue WA 98007
Kris Lenke	<i>Kris Lenke</i>	360 Whispering Cedar Ln. Chimacum, WA 98325
Theresa Chedden	<i>Theresa Chedden</i>	theresac@randomseed.net
MARSHA HENSEL	<i>Marsh Hensel</i>	PO 610, DT
Sammi & Gilley	<i>Sammi & Gilley</i>	25000 Poulson WA
Carol Kelley	<i>Carol Kelley</i>	25000 Poulson, WA 98370

Comment 530-Citizens of Clearwater Community-Petition-17 Signatures

PEPC 191160 -530

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OCT - 3 2006

September 30, 2006

DSC-P

National Park Service
Denver Service Center - Cliff Hawkes, DSC-P
12795 West Alameda Parkway
PO BOX 25287
Denver, CO 80225-9901

Dear Sir:

We, the citizens of the Clearwater community, are writing in response to the Olympic National Park General Management Plan (ID:10233), specifically the plans covering the Kalaloch and Queets areas. We have discussed alternatives A through D as a community and recommend the following actions be taken:

Kalaloch

1. Retain Highway 101 in its current location.

Reasoning:

- a. Allows more access to the resources in the Kalaloch area of the Olympic National Park including beach access and harvesting of traditional food sources.
 - b. Retains access to a unique area of the coastal scenic highway in Washington State. The rocky cliffs and scenic overlooks cannot be accessed anywhere else on the Washington coast.
 - c. Provides the least amount of environmental impact to the coastal park strip.
 - d. Is the only fiscally responsible alternative.
2. Return beach access to the original suite of trails, including Beach 1 through 7 and Ruby Beach.
 - a. Allows more access to the beaches in the Kalaloch area of the Olympic National Park.
 3. Expand camping facilities.
 - a. Creates more camping opportunities in the area including both beach and forest access.
 4. Reopen all park beaches to the traditional resource harvest areas including the gathering of fish and shellfish.
 - a. Spreads the impact of resource harvesting over a larger area and allows for more available food resources.
 5. Enlarge visitor's center with room for local culture and visitor center exhibits.
 - a. Retains the local history and culture for future generations.

Queets

1. No further expansion of the park boundary.
 - a. Retains the tax base needed to support local public resources, such as schools, healthcare and fire protection.
 - b. Reserves the existing areas for the traditional harvesting of food resources by the local community, including hunting, fishing, mushroom gathering, berry picking and etc.
 - c. Inclusion of this land within the park boundary would not significantly create more protection for salmon habitat or wild life resources.
2. Install a pedestrian bridge across the Queets River trail and improve the existing boat ramps.
 - a. Allows further access to the Queets River hiking trail and fishing resources. This will specifically improve the capabilities for the elderly and very young not able to withstand the raging river crossing.
3. Reestablish the geographical and cultural signage including; locations of the homesteads and graves, names of streams, and identification of the Olympic Mountain View.
4. Retains the local history and culture for future generations.
5. Reestablish road maintenance to the standards of Jefferson County prior to the land becoming park owned. This includes the campground/trailhead area.
 - a. Maintains full access to the Queets Corridor at all times.
6. Reopen and maintain traditional trails, for example the Telechy creek trail.
 - a. Retains access to the original areas including; homesteads and graves.

These points represent the recommendation of the local community and are complete. If any point in the Olympic National Park General Management Plan has not been mentioned it can be assumed that we feel there should be no changes from what exists today. Please consider these recommendations carefully as the impact of these decisions will weigh most heavily on our local community.

Sincerely,

The undersigned members of the local community.

Comment 325-Conservation Northwest-Form Letter-154 Received

Conservation Northwest Form letter
Sample

PEPC 190802-325



Vanetta Hambo
vanina7878@yahoo.com

To: olym_gmp@nps.gov
cc:
Subject: Comments on Olympic General Management Plan DEIS

09/24/2006 11:36 PM
AST
Please respond to

vanina7878

Re: Olympic National Park General Management Plan DEIS

Carla McConnell
Olympic National Park GMP
NPS Denver Service Center, Planning
P.O. Box 25287
Denver, CO 80025

Dear Ms. McConnell:

My family and I care very much about the future of the Olympic National Park. We urge the Park in its general management plan to pursue a fully restored ecosystem with its original components, processes, and habitat functions intact. Use should be managed to insure visitor enjoyment with the primary focus on protecting the health of the park's ecosystems into the future.

Significant changes have taken place since the last management plan in 1976. Roads, logging, and residential development of forest lands now characterize much of the park boundary. Increased recreational use of all types places demands on resources. Cumulative impacts on lower rivers and salmon streams and illegal hunting pressures have harmed park wildlife, fragmented habitats, and impaired ecosystem functions. Visitation to the park has increased dramatically, doubling since 1976.

To deal with these threats to the future ecological integrity of the park, the general management plan must be bold, farsighted, and embrace a broad view of the Park Service's role in maintaining the larger Olympic Peninsula ecosystem. Your 1976 master plan provided this kind of guidance for most of the past few decades, but I feel the preferred alternative in the current draft falls short of those goals.

I appreciate and support those recommendations in the preferred alternative D that drive the plan towards long-term protection. In particular, I support the following:

- Establishing marine intertidal reserves along sensitive areas of the coast.
- Recommending Wild and Scenic River designation for the Elwha River.
- Relocating the highway and other use facilities out of coastal erosion and flood-plain zones, decreasing risks to public.
- Expanding educational and interpretive programs.
- Encouraging mass transit in heavily used developed areas.

In contrast, several other recommendations in the preferred alternative D threaten the park's ecological integrity by emphasizing developed recreation and motorized access over natural resource protection and species restoration. I therefore urge you to:

- Expand park boundaries through land purchase in five areas (Ozette Lake, Lake Crescent, and Hoh, Queets, and Quinault watersheds) to protect critical habitats for salmon and wildlife as proposed in alternative B.
- Establish river protection zones to ensure that critical salmon habitats and natural river processes are preserved as proposed in alternative B. In addition, I recommend all 13 eligible rivers for federal Wild and Scenic River

designation.

- Recommend the recovery for threatened, endangered, and sensitive species and their habitat, and control of invasive and non-native plants and animals.
- Keep developed areas at their current size as described in alternative A. New recreational developments are best located outside the national park.
- Defer all decisions relating to wilderness until a comprehensive wilderness management plan is completed and available for public review.

This plan is a great first step in addressing the many issues within our national park, and I look forward to the next step in your planning process to provide further comment.

Thank you for your time and consideration.

Sincerely,

Annette Ramos
3514 28th Avenue NE
Seattle, WA 98117

Comment 210, 215-Friends of Lake Ozette-Petition-731 Signatures

190591
RECEIVED 215
9/14/2006 210

September 14, 2006

President George W. Bush
1600 Pennsylvania Ave
Washington DC, 20500

U.S. Senator Maria Cantwell
717 Hart Senate Office Bldg.
Washington DC 20510

U.S. Senator Patty Murray
173 Russell Senate Office Bldg.
Washington DC 20510

U.S. Congressman Norm Dicks
332 E. Fifth St.
Port Angeles, WA. 98362

State Senator Jim Hargrove
P.O. Box 40424 - 411 Legislative Office Bldg.
Olympia, WA. 98504

State Representative Jim Buck
P.O. Box 40600 - Mod. 1 Bldg., Rm. 112
Olympia, WA. 98504

State Representative Lynn Kessler
P.O. Box 40600 - 339A Leg. Office Bldg.
Olympia, WA. 98504

Clallam County Commissioners: Mike Chapman, Mike Doherty, Steve Tharinger
Clallam County Courthouse
223 East 4th St.
Port Angeles, WA. 98362

Carla McConnell
Olympic National Park - GMP
National Park Service Denver Service Center - Planning
P.O. Box 25287
Denver, CO. 80225

William G. Laitner, Superintendent
Olympic National Park Headquarters
600 E. Park Avenue
Port Angeles, WA. 98362

- Page Two -

**RE: National Park Service
U.S. Department of the Interior
Olympic National Park
Draft General Management Plan/Environmental Impact Statement
May, 2006**

ATTACHMENTS:

- 1) Copies of petitions with 670 signatures from your constituents in Clallam Bay and Sekiu, in Clallam County, Washington, joined by the signatures of visiting tourists to this area.
- 2) A copy of the article from the Forks Forum newspaper, dated August 23, 2006, in which staff from Olympic National Park state "Don't send us a form letter or petition".
- 3) A copy of the letter previously sent to your offices, dated August 3, 2006 from the Clallam Bay – Sekiu Chamber of Commerce, opposing any recommended changes to the present Management Plan at Lake Ozette.

Due to the stance on the part of Olympic National Park administration to negate these petitions as citizen input for the public record, we are sending them on to those who do listen to the people. We believe a required public input period should not be tampered with to eliminate opposing opinions. In addition, please note local citizens have reported that the information gathering process conducted by some ONP administrative staff has been intimidating and hostile at times. By accepting these petitions, please become aware of serious problems between the administration of Olympic National Park and private land owners within and near the Lake Ozette area. Please also note the citizens of Clallam Bay, Sekiu and Ozette, Washington are not in support of any of the recommended changes at Lake Ozette. ONP Staff have been quoted as saying "We are here to fit the plan to the community".

In this draft General Management Plan four alternatives were presented for Lake Ozette.

- Alternative A – Current Management Plan
- Alternative B – Resource Protection Emphasis
- Alternative C – Visitor Opportunities Emphasis
- Alternative D – Preferred Alternative – Developed by Park Staff

With these petitions, please be aware that 670 citizens feel the best "fit" for these communities is Plan A (Current Management Plan), which includes these alternatives, with our added input.

- Page Three -

- 1) We want the Parking Area retained right where it is (next to the \$1,000,000 new dormitory built in the last two years).
- 2) We want motorized and non-motorized boating opportunities allowed as they have been for generations.
 - Descendants of the original pioneers of this area still recreate with motorboats on Lake Ozette. The ONP – GMP recommends removing motorboat use from the lake as a “conflict” with other uses. This conflict has not been documented. In reality, the local land owners have rescued kayakers and canoeists from the lake many times when lake conditions have worsened, when ONP rangers have not been able to respond.
- 3) We do not want a wilderness suitability study completed for Lake Ozette.
 - There is enough wilderness within the Park system we can’t access now, besides how does one designate commercial timber lands, with roads, buildings, private land holdings and State waters a National wilderness?
 - We also believe the intended wilderness designations will allow Lake Ozette to become the playground for the 20 – 30 year old kayakers exclusively.
- 4) We would like Park visitor facilities improved.
 - What ever happened to the Interpretive Services once provided that no longer exist?
- 5) We support retaining and maintaining all lakeside camping opportunities as they exist today.
- 6) We strongly want to continue with the overnight use, day use, fishing and water access at Swan Bay and Rayonier Landing.
 - Access to private land holdings on the Lake must be provided.
 - In the winter, when the Ranger Station does not provide a launch, it becomes a water safety issue to retain launches at both Swan Bay and Rayonier Landing for the private land holders.
 - Rayonier Timber Company donated the land at Rayonier Landing for local citizens to use. This Draft GMP recommends closing this much needed boat launch and reversing the intentions for which this land had been given.
 - Toilet facilities are already in place at both of these locations.
 - Seasonal usage of these two areas has been a tradition in families from the local communities of Clallam Bay, Sekiu and Neah Bay for generations.
- 7) We would hope the Park would purchase properties, including boundary adjustments, only from willing sellers on the seller’s initiation.
- 8) Lastly, we would like ONP to maintain in good condition, the trail system it already has in place.

- Page Four -

We feel the National Park Service will utilize this Draft General Management Plan process to dictate future policy with input, however without consideration. Land acquisitions proposed at Lake Ozette were never discussed with the local timber companies who own the private lands proposed to acquire. The timber companies were informed by reading the local newspapers. We question the authority of the NPS to implement changes without documenting reasons for the changes. Nothing more than a philosophical guideline to 'protect these resources' has dictated denying use of these lands by the very people for which they were established.

Lake Ozette is the third largest lake in the State of Washington. At present, 95% of Olympic National Park has been designated wilderness. The east shore of Lake Ozette is within the small 5% of accessible non-wilderness. This section of Olympic National Park is extremely popular with visiting tourists. Any restrictions in recreational uses at this Lake will have a serious detrimental affect on the tourism economy of these bordering rural communities.

At present, handicapped individuals, senior citizens, and children can experience Lake Ozette, but that will all change soon. While we support the basic premise of protecting these resources for future generations, we believe the present Preferred Alternative D, is intending to severely limit recreational uses – across all of Olympic National Park, and especially at Lake Ozette, such that the majority of future generations will not be able to enjoy these resources at all. Lake Ozette is headed in the direction of being protected too much, with serious economic consequences. This extreme level of protection, across all of Olympic National Park, has required Park Rangers to become law enforcers and has consequently forced the relationships between rangers and visitors into a typical, all too frequent, conflict situation.

In closing, in Plans B, C and D we find the General Management Plan recommendations ambiguous, as was intended. Due to the severe loss of recreational enjoyment for the tourists, pioneer descendants, local senior citizens, private land owners, handicapped individuals and families of this area.....

"We, the undersigned, will only endorse Plan A of the 2006 Olympic National Parks General Management Plan, under which no changes in the current management strategies would occur. In addition, we oppose plans B, C and D and all they imply."

Respectfully Submitted,

By the FRIENDS OF LAKE OZETTE

c/o Lost Resort at Lake Ozette
20860 Hoko Ozette Road
Clallam Bay, WA. 98326

"We, the undersigned, will only endorse Plan A of the 2006 Olympic National Parks General Management Plan, under which no changes in the current management strategies would occur. In addition, we oppose plans B, C and D and all they imply. "

	<u>PRINT NAME</u>	<u>ADDRESS</u>	<u>SIGNATURE</u>
1.	CALVIN HANKS	PO BOX 413 CLALLAM BAY	Calvin Hanks
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23.			

Comment 42–National Parks and Conservation Association–Form Letter–233 Received

National Parks and Conservation Association Form Letter

PEPC 188604-42

Superintendent Bill Laitner
c/o the Denver Service Center Cliff Hawkes, DSC-P
12795 West Alameda Parkway, PO Box 25287
Denver, CO 80225-9901

Dear Superintendent Laitner,

I fully support the National Parks Conservation Association's "Guarding park Resources and wildlife, Transportation, Gateway Communities and recreation Opportunities for our Descendants" (Greater Good) alternative to Olympic's draft general management plan. NPCA's "Greater Good" alternative better protects visitor enjoyment, gateway communities and park wildlife and resources, calling for the maintenance and full staffing of visitor centers, as well as needed boundary adjustments. The current alternatives do not provide the appropriate mix of visitor use with resource protection.

Olympic National Park is one of the most cherished places in the Pacific Northwest. I urge the National Park Service (NPS) to adopt NPCA's "Greater Good" alternative. We owe it to future generations to ensure the continued stewardship of this resource. Thank for considering my views.

Sincerely,

A solid black rectangular redaction box covering the signature area.

Comment 169-Naturist Action Committee-Form Letter-19 Received

Naturist Action Committee Form Letter Sample PEPC 190448 - 169

Organization Type: I - Unaffiliated Individual
Address: Two West Michigan Ave.
Battle Creek, MI 49017
Battle Creek, MI 49017
USA
E-mail: bschroer@socialmarketing.org

Correspondence Information

Status: New **Park Correspondence Log:**
Date Sent: 09/14/2006 **Date Received:** 09/14/2006
Number of Signatures: 1 **Form Letter:** Master
Contains Request(s): No **Type:** Web Form
Notes:

Correspondence Text

I want to thank the National Park Service for the opportunity to provide my comments on thoughts on this significant change to the Olympic National Park.

First, I specifically believe that none of the four alternatives adequately addresses the issues behind the problems at the Olympic Hot Springs.

I do strongly support the amendments proposed for consideration by the Naturist Society. For the record, they are restated as:

A. Retain the soaking pools at the Hot Springs site but reduce the overall number to three or four, located near the main source. This will improve cleanliness by offering less restriction to flow. It will help rehabilitate the runoff area, reduce the impact of use and enhance the integrity of the environment.

B. Contract the maintenance of the resource to an experienced caretaker. This approach has been implemented with great success by other agencies responsible for managing hot spring resources in the Pacific Northwest.

C. Convert the road (Olympic Hot Springs Road) to a trail beyond the Altair site. This is similar to an item proposed in Alternative B of the draft of the General Management Plan.

Additionally, as a long time naturist I would sincerely hope:

1. Clothing-optional use which is traditional at this site in the park is allowed to continue. Clothing optional use is an environmentally friendly, low impact use of the resource.
2. Naturists are responsible stewards of public lands.
3. "Rehabilitation" of Olympic Hot Springs does not require that the resource be made unusable for those seeking remote recreational experiences.

Other details of Alternative D, the NPS-preferred plan, accommodate traditional uses, and the traditional use at Olympic Hot Springs should be among those that are retained.

As a long time naturist and supporter of the National Park system I believe naturist and NPS efforts should work together to create a safe, healthy and enjoyable park environment that may be utilized by everyone, including naturists.

Thank you for allowing me to comment on this important issue.

Sincerely,

Comment 187–Naturist Action Committee–Form Letter–19 Received

Naturist Action Committee Form Letter
Sample # 2

PEPC 190531-187



[Redacted]
[Redacted]
09/14/2006 09:43 PM
MST

To: <olym_gmp@nps.gov>
cc:
Subject: Please save Olympic Hot Springs!!!!

Carla McConnell
Olympic National Park — GMP

Dear Ms. McConnell,

My name is [Redacted]. I have had the pleasure of knowing about Olympic Hot Springs since 1991. It is one of the most special places in the Olympic National Park. When I here people talking about the "special place" they go to in their minds when they are stressed or upset, I think of Olympic Hot Springs. In 1991 I took a hike to Olympic Hot Springs in November. I was soaking in the upper pool totally enjoying the cold air when it started snowing. This is my "special place," please do not take it away. I use the hot springs as often as I can but especially in the off season.

I understand there are several proposed plans to change Olympic Hot Springs. As I understand them, NONE of the four proposed alternatives adequately addresses the special nature of Olympic Hot Springs. I whole heartedly endorse the Naturist Action Committee on the following issues:

- A. Retain soaking at Olympic Hot Springs, but reduce the number of pools at the Springs site to three or four, located near the main source. This will improve cleanliness by offering less restriction to flow. It will help rehabilitate the runoff area, reduce the impact of use and enhance the integrity of the environment.
- B. Contract the maintenance of the resource to an experienced caretaker. This approach has been implemented with great success by other agencies responsible for managing hot spring resources in the Pacific Northwest.
- C. Convert the road (Olympic Hot Springs Road) to a trail beyond the Altair site. This is similar to an item proposed in Alternative B of the draft of the General Management Plan.

I believe:

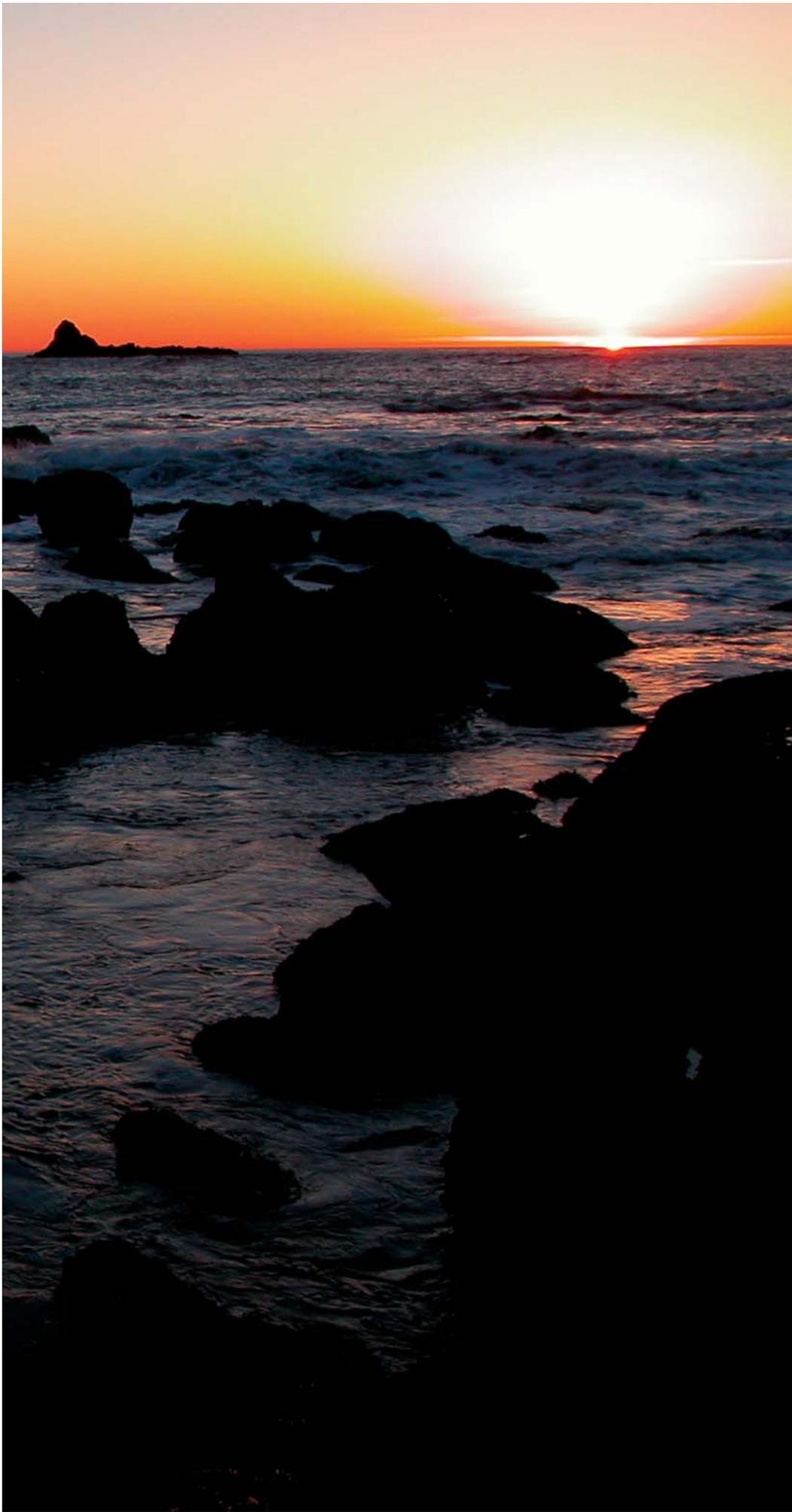
1. Clothing-optional use at traditional sites in the park, like Olympic Hot Springs, is an environmentally friendly, low impact use of the resource.
2. Naturists are responsible stewards of public lands.
3. "Rehabilitation" of Olympic Hot Springs does not require that the resource be made unusable for those seeking remote recreational experiences. Other details of Alternative D, the NPS-preferred plan, accommodate traditional uses, and the traditional use at Olympic Hot

Springs should be among those that are retained.

Thank you for you time.

Respectfully,

[Redacted Signature]



Appendixes, References, Preparers, and Consultants, and Index

APPENDIX A: LEGISLATION

16. Olympic National Park

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Acquisition of non-Federal land within park in exchange for national forest land.....	82

An Act To establish the Olympic National Park, in the State of Washington, and for other purposes, approved June 29, 1938 (52 Stat. 1241)

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

That the Mount Olympus National Monument established pursuant to proclamation of the President dated March 2, 1909, is hereby abolished, and the tracts of land in the State of Washington particularly described as follows, to wit: Township 25 north, range 4 west, sections 5 to 8, 17 to 20, and 29 to 32, inclusive (unsurveyed); township 26 north, range 4 west, sections 1 to 12, 17 to 20, and 29 to 32, inclusive (unsurveyed); township 27 north, range 4 west, sections 5 to 8, 17 to 20, and 29 to 36, inclusive (unsurveyed); township 28 north, range 4 west, sections 17 to 22, and 27 to 34, inclusive (unsurveyed); townships 25, 26, and 27 north, range 5 west (unsurveyed); township 28 north, range 5 west, sections 7 to 36, inclusive (unsurveyed); township 24 north, range 6 west, sections 3 to 10, 15 to 22, and 27 to 34, inclusive (unsurveyed); townships 25, 26, and 27 north, range 6 west (unsurveyed); township 28 north, range 6 west, sections 7 to 36, inclusive (unsurveyed); townships 24, 25, 26, and 27 north, range 7 west (unsurveyed); township 28 north, range 7 west, sections 5 to 36 inclusive (unsurveyed); township 24 north, range 8 west, sections 1 to 18, inclusive (partly surveyed); townships 25, 26, 27, and 28 north, range 8 west (unsurveyed); township 29 north, range 8 west, sections 6, 7, 18, 19 to 21, and 28 to 33, inclusive (unsurveyed); township 30 north, range 8 west, sections 18, 19, 30, and 31 (partly surveyed); township 24 north, range 9 west, sections 1, 2, 11, 12, 13, and 14 (partly surveyed); township 25 north, range 9 west (unsurveyed); township 26 north, range 9 west, sections 1 to 18, inclusive (unsurveyed), each half of section 19 (unsurveyed), sections 20 to 29, and 32 to 36, inclusive (surveyed); townships 27 and 28 north, range 9 west (unsurveyed); township 29 north, range 9 west (partly surveyed); township 30 north, range 9 west, sections 13, 14, and 23 to 36, inclusive (partly surveyed); township 26 north, range 10 west, sections 1, 12, and 13 (surveyed); township 27 north, range 10 west, sections 1 to 6, inclusive, 12, 13, 24, 25, and 36 (surveyed); township 28 north, range 10 west, south half section 7, south half

Olympic National Park, Wash., established. Mount Olympus National Monument abolished. 35 Stat. 2247. Lands transferred to park.

II. NATIONAL PARKS — OLYMPIC

section 8, south half section 9, south half section 10, south half section 11, south half section 12, sections 13 to 36, inclusive (unsurveyed) all west of the Willamette meridian, in Washington, are hereby reserved and withdrawn from settlement, occupancy, or disposal under the laws of the United States and dedicated and set apart as a public park for the benefit and enjoyment of the people and shall be known as the Olympic National Park, and all lands formerly included in the Mount Olympus National Monument and not included in the above description are hereby transferred to and made a part of the Olympic National Forest. (16 U.S.C. sec. 251.)

Lands transferred to Olympic National Forest.

SEC. 2. That in the areas of said park lying east of the range line between ranges 9 and 10 and north of the seventh standard parallel, and east of the range line between ranges 4 and 5 west, Willamette meridian, all mineral deposits of the classes and kinds now subject to location, entry, and patent under the mining laws of the United States shall be, exclusive of the land containing them, subject to disposal under such laws for a period of five years from the date of approval of this Act, with rights of occupation and use of so much of the surface of the land as may be required for all purposes reasonably incident to the mining or removal of the minerals and under such general regulations as may be prescribed by the Secretary of the Interior. (16 U.S.C. sec. 252.)

Mineral deposits.

SEC. 3. The income of each county receiving moneys from the Olympic National Forest, under the Act of May 23, 1908 (35 Stat. 260, ch. 192), as amended, shall be proportional to the total area of each county in the Olympic National Forest and the Olympic National Park combined. (16 U.S.C. sec. 253.)

Division of receipts for schools and roads. 16 U.S.C. sec. 500.

SEC. 4. The administration, protection, and development of the Olympic National Park shall be exercised under the direction of the Secretary of the Interior by the National Park Service, subject to the provisions of the Act of August 25, 1916 (39 Stat. 535), entitled "An Act to establish a National Park Service, and for other purposes", as amended. (16 U.S.C. sec. 254.)

Administration, etc. 16 U.S.C., ch. 1.

SEC. 5. Nothing herein contained shall affect any valid existing claim, location, or entry made under the land laws of the United States, whether for homestead, mineral, right-of-way, or any other purpose whatsoever, or shall affect the right of any such claimant, locator, or entryman to the full use and enjoyment of his land, nor the rights reserved by treaty to the Indians of any tribes.

Existing claims, etc., not affected.

The President may after eight months from the approval of this Act by proclamation add to the Olympic National Park any lands within the boundaries of the Olympic National Forest, and any lands which may be acquired by the Government by gift or purchase, which he may deem it advisable to add to such park; and any lands so added to such park shall, upon their addition thereto, become

Additions to park.

II. NATIONAL PARKS — OLYMPIC

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subject to all laws and regulations applicable to other lands within such park: *Provided*, That the total area of the said park shall not exceed eight hundred and ninety-eight thousand two hundred and ninety-two acres: *Provided further*, That before issuing any such proclamation, the President shall consult with the Governor of the State of Washington, the Secretary of the Interior, and the Secretary of Agriculture and advise them of the lands which he proposes to add to such park, and shall afford them a reasonable opportunity to consult with and communicate to him their views and recommendations with respect to the addition of such lands to such park.¹ (16 U.S.C. sec. 255.)

Provisos.
Limitation.

Consultation
before issuance
of proclama-
tion.

Excerpt from an Act of the Legislature of Washington, approved March 8, 1941, ceding to the United States exclusive jurisdiction over the territory then included in the Olympic National Park. (Chapter 51 of the Laws of 1941 of the State of Washington)

Exclusive jurisdiction shall be, and the same is hereby ceded to the United States over and within all the territory that is now included in that tract of land in the State of Washington, set aside for the purposes of a national park, and known as the Olympic National Park; saving, however, to the said state, the right to serve civil and criminal process within the limits of the aforesaid park, in suits or prosecutions for or on account of rights acquired, obligations incurred, or crimes committed in said state, but outside of said park; and saving further to the said state the right to tax persons and corporations, their franchises and property on the lands included in said park: PROVIDED, HOWEVER, This jurisdiction shall not vest until the United States through the proper officer, notifies the Governor of this state that they assume police or military jurisdiction over said park.

An Act To accept the cession by the State of Washington of exclusive jurisdiction over the lands embraced within the Olympic National Park, and for other purposes, approved March 6, 1942 (56 Stat. 135)

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That the provisions of the act of the Legislature of the State of Washington, approved March 8, 1941 (Chapter 51 of the Laws of 1941 of the State of Washington), ceding to the United States exclusive jurisdiction over and within all the territory included on March 8, 1941, in the tract of land in the State of Washington, set aside for the purposes of a national park and known as the Olympic National Park, are hereby accepted. Subject to the reservations made by the State in the act of cession, the United States hereby assumes sole and exclusive jurisdiction over such territory. (16 U.S.C. sec. 256.)

Olympic National Park,
Wash.
Cession of jurisdiction to U.S.

¹ See proclamations No. 2380 of January 2, 1940 (3 CFR, CUM.SUPP., 140), and No. 2587 of May 29, 1943 (3 CFR, CUM.SUPP., 333), adding land to the park.

Assignment to
Washington
western judicial
district.

SEC. 2. The park shall constitute a part of the United States judicial district for the western district of Washington, and the district court of the United States in and for said district shall have jurisdiction over all offenses committed within the boundaries of the park. All fugitives from justice taking refuge in the park shall be subject to the same laws as refugees from justice found in the State of Washington. (16 U.S.C. sec. 256a.)

Hunting, fishing,
etc., prohibitions.

SEC. 3. All hunting or the killing, wounding, or capturing at any time of any wild bird or animal, except dangerous animals when it is necessary to prevent them from destroying human lives or inflicting personal injury, is prohibited within the limits of the park, nor shall any fish be taken out of any of the waters of the park, except at such seasons and at such times and in such manner as may be directed by the Secretary of the Interior. The Secretary of the Interior shall make and publish such general rules and regulations as he may deem necessary and proper for the management and care of the park and for the protection of the property therein, especially for the preservation from injury or spoliation of all timber, mineral deposits, natural curiosities, or wonderful objects within the park, and for the protection of the animals and birds in the park from capture or destruction, and to prevent their being frightened or driven from the park; and he shall make rules and regulations governing the taking of fish from the waters in the park. Possession within the park of the dead bodies or any part thereof of any wild bird or animal shall be prima facie evidence that the person or persons having the same are guilty of violating this Act. Any person or persons, stage or express company, railway or other transportation company, who knows or has reason to believe that such wild birds, fish, or animals were taken or killed contrary to the provisions of this Act or the rules and regulations promulgated by the Secretary of the Interior, and who receives for transportation the dead bodies or any part thereof of the wild birds, fish, or animals so taken or killed, or who shall violate any of the other provisions of this Act, or the rules and regulations, with reference to the management and care of the park, or for the protection of the property therein, for the preservation from injury or spoliation of timber, mineral deposits, natural curiosities, or wonderful objects within the park, or for the protection of the animals, birds, and fish in the park, or who shall within the park commit any damage, injury, or spoliation to or upon any building, fence, sign, hedge, gate, guidepost, tree, wood, underwood, timber, garden, crops, vegetables, plants, land, springs, mineral deposits, natural curiosities, or other matter or thing growing or being thereon, or situated therein, shall be deemed guilty of a misdemeanor and shall be subject to a fine of not more than \$500 or imprisonment not exceeding six months, or both, and be adjudged to pay all the costs of the proceedings. (16 U.S.C. sec. 256b.)

Rules and
Regulations.

Penalties.

II. NATIONAL PARKS — OLYMPIC

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SEC. 4. All guns, traps, nets, seines, fishing tackle, teams, horses, or means of transportation of every nature or description used by any person or persons within the limits of the park when engaged in killing, trapping, ensnaring, taking, or capturing such wild birds, fish, or animals contrary to the provisions of this Act or the rules and regulations promulgated by the Secretary of the Interior shall be forfeited to the United States and may be seized by the officers in the park and held pending prosecution of any person or persons arrested under the charge of violating the provisions of this Act, and upon conviction under this Act of such person or persons using said guns, traps, nets, seines, fishing tackle, teams, horses, or other means of transportation, such forfeiture shall be adjudicated as a penalty in addition to the other punishment prescribed in this Act. Such forfeited property shall be disposed of and accounted for by and under the authority of the Secretary of the Interior: *Provided*, That the forfeiture of teams, horses, or other means of transportation shall be in the discretion of the court. (16 U.S.C. sec. 256c.)

SEC. 5. Upon the recommendation and approval of the Secretary of the Interior of a qualified candidate, the United States District Court for the Western District of Washington shall appoint a park commissioner, who shall have jurisdiction to hear and act upon all complaints made of any violations of law or of the rules and regulations made by the Secretary of the Interior for the government of the park and for the protection of the animals, birds, and fish, and objects of interest therein, and for other purposes authorized by this Act. Such commissioner shall have power, upon sworn information, to issue process in the name of the United States for the arrest of any person charged with a violation of the rules and regulations, or with a violation of any of the provisions of this Act prescribed for the government of the park and for the protection of the animals, birds, and fish in the park, and to try the person so charged, and, if found guilty, to impose punishment and to adjudge the forfeiture prescribed. In all cases of conviction an appeal shall lie from the judgment of the commissioner to the United States District Court for the Western District of Washington; and the district court shall prescribe the rules of procedure and practice for the commissioner in the trial of cases and for appeal to the district court. (16 U.S.C. sec. 256d.)

SEC. 6. The park commissioner shall also have power to issue process, as hereinbefore provided, for the arrest of any person charged with the commission within the park of any criminal offense not covered by the provisions of section 3 of this Act, to hear the evidence introduced, and, if he is of the opinion that probable cause is shown for holding the person so charged, for trial, shall cause such person to be safely conveyed to a secure place of confinement within the jurisdiction of the United States District

Forfeiture of property used for unlawful purposes.

Provido.

Park commissioner.

Appointment and jurisdiction.

Judicial powers.

Appeals.

Procedure in other cases.

Bail. Court for the Western District of Washington, and certify a transcript of the record of his proceedings and the testimony in such case to the said district court, which court shall have jurisdiction of the case. The park commissioner shall have authority to grant bail in all cases according to the laws of the United States. (16 U.S.C. sec. 256e.)

Pay of commissioner. SEC. 7. The park commissioner shall be paid an annual salary as appropriated for by Congress. (16 U.S.C. sec. 256f.)

Fees, costs, and expenses. SEC. 8. All fees, costs, and expenses arising in cases under this Act and properly chargeable to the United States shall be certified, approved, and paid as are like fees, costs, and expenses in the courts of the United States. (16 U.S.C. sec. 256g.)

Deposit of collections. SEC. 9. All fees, fines, costs, and expenses imposed and collected shall be deposited by the commissioner, or by the marshal of the United States collecting the same, with the clerk of the United States District Court for the Western District of Washington. (16 U.S.C. sec. 256h.)

Notice of acceptance of jurisdiction. SEC. 10. The Secretary of the Interior shall notify in writing the Governor of the State of Washington of the passage and approval of this Act, and of the fact that the United States assumes police jurisdiction over the park. Upon the acceptance by the Secretary of the Interior of further cessions of jurisdiction over lands now or hereafter included in the Olympic National Park, the provisions of sections 2 to 9, inclusive, shall apply to such lands. (16 U.S.C. sec. 256i.)

An Act To authorize the exchange of lands not in Federal ownership within the Olympic National Park, Washington, for national forest lands in the State of Washington, approved December 22, 1942 (56 Stat. 1070)

Olympic National Park, Wash. Exchange of lands.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That title to State, county, and private lands situated north of the line between townships 27 and 28 north, Willamette base and meridian, Washington, and within the boundaries of the Olympic National Park as now or hereafter established by proclamation of the President of the United States, shall be subject to acceptance under the provisions of the Act approved March 20, 1922 (42 Stat. 465; 16 U.S.C. 485), and such lands when vested in the ownership of the United States shall be a part of the Olympic National Park subject to all laws and regulations applicable thereto. (16 U.S.C. sec. 251a.)

Public Law 99-635
99th Congress

An Act

To revise the boundaries of Olympic National Park and Olympic National Forest in the State of Washington, and for other purposes.

Nov. 7, 1986
 [S. 2351]

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. (a) The boundary of Olympic National Park, Washington, is hereby revised to include within the park—

National Forest System.
 National parks, monuments, etc.
 National Wilderness Preservation System.
 16 USC 251n.

(1) all submerged lands and waters of Lake Ozette, Washington, and the Ozette River, Washington;

(2) all surveyed and unsurveyed islands lying off the coast of the State of Washington in the Pacific Ocean between latitudes 48 degrees 23 minutes north and 47 degrees 38 minutes north;

Indians.
 Fish and fishing.

(3) those lands between mean high tide and the lowest low tide beginning in section 22, township 24 north, range 13 west Willamette meridian, at the common boundary between the Olympic National Park and the Quinault Indian Reservation, to section 18, township 32 north, range 15 west Willamette meridian, at the common boundary between the Olympic National Park and the Makah Indian Reservation, except those lands directly adjacent to and west of the Hoh, Ozette, and Quillayute Indian Reservations: Provided, That such lands as are identified in this paragraph shall continue to be open to fishing and to the taking of shellfish in conformity with the laws and regulations of the State of Washington; and

(4) approximately nine thousand six hundred and thirtyeight acres, and to exclude from the park approximately three thousand three hundred and fifty-two acres, as generally depicted on the maps entitled "Boundary Modifications, Olympic National Forest and Olympic National Park", numbered 149/60,030A, sheets 1 through 9, and dated September 1986, which shall be on file and available for public inspection in the office of the National Park Service, United States Department of the Interior.

Public information.

(b) The boundary of Olympic National Forest, Washington, is hereby revised to include in the national forest approximately three thousand three hundred and fifty-two acres and to exclude from the national forest approximately nine thousand three hundred and twenty-four acres, as generally depicted on the maps entitled "Boundary Modifications, Olympic National Forest and Olympic National Park", numbered 149/60,030A, sheets 1 through 10, and dated September 1986, which shall be on file and available for public inspection in the office of the Forest Service, United States Department of Agriculture.

Public information.
 16 USC 251n note.

(c) Section 3 of the Washington State Wilderness Act of 1984 (Public Law 98-339, Act of July 3, 1984, 98 Stat. 301) is amended—

98 stat. 299.

(1) by striking subsection (2) and inserting in lieu thereof the following new subsection:

“(2) certain lands in the Olympic National Forest, Washington, which comprise approximately forty-four thousand four hundred and seventy-four acres, **as** generally depicted on a map entitled ‘Buckhorn Wilderness—Revised’, numbered **98-339-3(2)**, sheets 1 and 2, and dated September 1986, and which shall be known **as** the Buckhorn Wilderness;”;

(2) by striking subsection (13) and inserting in lieu thereof the following new subsection:

“(13) certain lands in the Olympic National Forest, Washington, which comprise approximately thirteen thousand and fifteen acres, **as** generally depicted on a map entitled ‘Mount Skokomish Wilderness—Revised’, numbered **98-339-3(13)** and dated September 1986, and which shall be known as the ‘Mount Skokomish Wilderness—Revised’, dated September 1986, and which shall be known **as** the Mount Skokomish Wilderness;”;

and

(3) by striking subsection (19) and inserting in lieu thereof the following new subsection:

“(19) certain lands in the Olympic National Forest, Washington, which comprise approximately sixteen thousand six hundred and eighty-two acres, **as** generally depicted on a map entitled ‘The Brothers Wilderness—Revised’, numbered **98-339-3(19)** and dated September 1986, and which shall be known **as** ‘The Brothers Wilderness;’.”.

Public lands.
Water.
16 USC 251n
note.

SEC. 2. (a) Federal lands, waters, and interests therein formerly within the boundary of Olympic National Forest which are included within the boundary of Olympic National Park pursuant to section 1 of this Act are, subject to valid existing rights, hereby transferred to the administrative jurisdiction of the Secretary of the Interior for administration **as** part of the park, and shall be subject to all the laws and regulations applicable to the park: Provided further, That within section 15, township 15 north, range 9 west Willamette meridian, and within an area extending not more than one mile north of such section, nothing herein shall be construed to limit or otherwise modify the authority of the Secretary of Agriculture to design and construct a forest logging road east of the park boundary: *Provided, however,* That the Secretary of Agriculture shall not construct the road **as** close **as** practically possible to the park boundary but not more than five hundred feet east **of** the divide. Following construction, the Secretary of the Interior is hereby authorized and directed to redescribe and relocate the boundary of the park along the eastern clearing limits of the road.

(b) Federal lands, waters, and interests therein formerly within the boundary of Olympic National Park which are excluded therefrom pursuant to section 1 of this Act are, subject to valid existing rights, hereby transferred **to** the administrative jurisdiction of the Secretary of Agriculture for administration **as** part of Olympic National Forest, and shall be subject to all the laws and regulations applicable to the National Forest System: *Provided,* That any lands deleted from the park and included within the Buckhorn Wilderness, Mount Skokomish Wilderness, or **The** Brothers Wilderness pursuant to this Act shall be managed in accordance with the provisions of the Washington State Wilderness Act of 1984 (Public Law 98-339, Act of July 3, 1984, 98 Stat. 301).

SEC. 3. (a) The Secretary of the Interior is authorized to acquire by donation, purchase with donated or appropriated funds, exchange, bequest or otherwise any non-Federal lands, waters, and interests

98 Stat. 299.
Gifts and
property.
Real property.
Water.
16 USC 251n
note.

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100 STAT. 3529

therein included within the boundary of Olympic National Park pursuant to section 1 of this Act: Provided: That any lands, waters, or interests therein owned by the State of Washington or any political subdivision thereof may be acquired only by donation or exchange.

(b) For the purpose of section 7 of the Land and Water Conservation Fund Act of 1965 (78 Stat. 903, as amended, 16 U.S.C. 4601-9), the boundary of the Olympic National Forest, as modified pursuant to section 1 of this Act, shall be treated as if it was the boundary of that national forest on January 1, 1965.

SEC. 4. There are hereby authorized to be appropriated such sums as may be necessary to carry out the purposes of this Act, except that the total amounts authorized to be appropriated for the purpose of acquisition of lands, waters, and interests therein pursuant to this Act shall not exceed \$1,000,000.

Appropriation authorization.

Real property
Water
16 USC 251n
note

Approved November 7, 1986.

LEGISLATIVE HISTORY—S. 2351:

SENATE REPORTS: No. 99-510 (Comm. on Energy and Natural Resources).
CONGRESSIONAL RECORD, Vol. 132 (1986):
Oct. 10, considered and passed Senate.
Oct. 15, considered and passed House.



APPENDIX B: ANALYSIS OF BOUNDARY ADJUSTMENT AND LAND PROTECTION CRITERIA

As one of the provisions of Public Law 95-625, the National Parks and Recreation Act of 1978, Congress directed that the National Park Service consider, as part of a planning process, what modifications of external boundaries might be necessary to carry out park purposes. Subsequent to this act, Congress also passed Public Law 101-628, the Arizona Desert Wilderness Act. Section 1216 of this act directs the secretary of the interior to develop criteria to evaluate any proposed changes to the existing boundaries of individual park units. Section 1217 of the act calls for the National Park Service to consult with affected agencies and others regarding a proposed boundary change and to provide an estimate of acquisition cost, if any, related to the boundary adjustment. In addition, in the Washington Park Wilderness Act of 1988, Report 100-512, the National Park Service was directed to conduct a study of the watershed of Lake Ozette, with particular focus on the immediate scenic backdrop of the lake. The study was to consider various alternatives to protect the area, including the potential for land exchanges and acquisitions of lands or interests in lands (e.g. conservation easements).

NPS *Management Policies* (Section 3.5 “Boundary Adjustments”) state that the National Park Service will conduct studies of potential boundary adjustments and may make boundary revisions for the following reasons:

- to include significant resources or opportunities for public enjoyment related to the purposes of the park
- to address operational and management issues such as boundary and identification by topographic or other natural features
- to protect park resources critical to fulfilling park purposes

NPS policies instruct that any recommendation to expand park boundaries be preceded by determinations that the added lands will be feasible to administer considering size, configuration, ownership, cost, and other factors, and that other alternatives for management and resource protection have been considered and are not adequate.

During development of general management plans, it is necessary and appropriate for the National Park Service to determine whether existing conditions provide adequate protection for park resources, or if additional protection is warranted such that land acquisition or other management approaches should be considered.

The following is a review of the criteria for boundary adjustments as applied to Olympic National Park. This analysis is included as supporting documentation for alternatives B, C, and D (preferred) of this *General Management Plan / Environmental Impact Statement*, which include recommendations for boundary changes to the national park. The following areas were considered for potential exchanges in the alternatives:

- Lake Crescent
- Ozette Lake watershed
- Hoh River corridor
- Queets River corridor
- Quinault River corridor

The lands considered in the potential boundary adjustments are a combination of state lands managed by the Washington Department of Natural Resources, private lands, and U.S. Forest Service-administered lands.

In addition to these proposed boundary modifications, the final plan proposes a land exchange between the National Park Service and the State of Washington. This would involve exchanging state ownership of approximately 50,000 acres of subsurface mineral rights within Olympic National Park, and some 4,100 acres

of surface and subsurface parcels near Ozette Lake, Lake Crescent, and the Queets River units of the park, for suitable resource lands at yet undetermined locations within the State of Washington. The lands designated for exchange would not be added to the park but would be added to the Washington Department of Natural Resources land base. These new state lands may provide benefits to schools or local communities. The NPS would work with the Washington Department of Natural Resources to develop a priority list of lands that would be considered for this exchange.

Legislation would be required to: expand the park boundary in the three proposed areas; to allow for a land exchange with the state of Washington; and, to reaffirm the ability of the NPS to acquire private lands outside the existing boundary of the park for the purposes of exchange. Appropriate companion state legislation would be required to effect this exchange and to ensure the revenue from the state lands would continue to provide income to the state trust and other commitments to county governments and other local taxing districts.

Significant Resources or Opportunities for Public Enjoyment Related to the Purpose of Olympic National Park

Ozette Lake area

A boundary adjustment would be proposed to protect resources within and along the eastern shoreline of Ozette Lake, including tributary and lake water quality, fisheries (e.g. threatened Ozette Lake sockeye and the rare Olympic mudminnow), native and rare plants, and wildlife. The remainder of the Lake Ozette watershed would be protected by a cooperative public land conservation strategy that would be used to protect the three elk herds that inhabit the watershed, the water quality of the lake, scenic values, and the natural resource values of the watershed, including 17 species of plants that are considered rare within the park and 10 other species on the Washington State rare plant list. The addition of lands immediately surrounding Ozette Lake would be an important benefit to park resources and visitor experiences through the protection and management of these lands under NPS mandates and policies.

Lake Crescent area

The addition to the park would protect the Lyre River and Lake Crescent outlet area, which are critical to Beardslee and Crescentii trout spawning areas and rearing habitat. Both the Beardslee and Crescentii trout evolved in response to the unique geologic history of Lake Crescent, which was isolated from the Elwha watershed approximately 5,000 years ago by a catastrophic landslide. Lake Crescent is the only place in the world where the Beardslee trout spawn.

The park addition would protect the Lyre River and the lake outlet, which provide critical spawning habitats for Crescentii trout and provide a migratory corridor for trout moving to and from the lake. Crescentii trout express a unique life history in that they swim downstream to spawn, while fry must swim upstream to rear in Lake Crescent.

Protecting these habitats from future development and timber harvest would also assist in preventing increased sedimentation and protect the water quality of the Lyre River and Lake Crescent.

Queets Corridor

The proposal would afford greater potential to enhance elk habitat. Elk in the Queets corridor use the floodplain in this area during the winter for thermal regulation and foraging. Protecting portions of McKinnon and Hibbard creeks would benefit spawning coho salmon. Each creek supports rearing habitat. Increased protection of riparian zones and upland process would benefit physical habitat conditions and water quality. Additionally, the proposed boundary exchange would improve public safety through increased physical separation between activities on private lands, including hunting, and public uses along the river corridor.

Hoh Corridor (Alternative B only)

Protecting the Hoh corridor would offer a greater potential to enhance elk habitat. Elk herds use the Hoh floodplain during the winter for thermal regulation and foraging. Protecting the floodplain and upland resources would benefit fisheries in the Hoh River, including the threatened bull trout, and salmon; it would also, protect the habitat conditions and water quality.

Quinault (Alternative B only)

Protecting the full meander width of the Quinault River upstream of Lake Quinault would protect elk habitat in that area. Elk herds use the area during the winter for thermal regulation and foraging.

Operational and Management Issues Related to Access and Boundary Identification by Topographic or other Natural Features

Queets Corridor

The proposed boundary change provides a more logical assemblage of land and gives the public a better recognition of where protected areas are within the park. Additionally, the proposed boundary exchange would improve public safety through increased physical separation between activities on private lands, including hunting, and public uses along the river corridor.

Quinault (Alternative B only)

The park boundary in the Quinault valley was originally defined by the location of the center of the river channel, as the river was aligned in the 1930s. The proposed boundary change would clarify the boundary independent of the river alignment, which has changed dramatically from year to year.

Protection of Park Resources and Fulfillment of Park Purpose

Olympic National Park was established to “*preserve for the benefit, use and enjoyment of the people, the finest sample of primeval forests of Sitka spruce, western hemlock, Douglas fir, and western red cedar in the entire United States; to provide suitable winter range and permanent protection for the herds of native Roosevelt elk and other wildlife indigenous to the area; to conserve and render available to the people, for recreational use, this outstanding mountainous country, containing numerous glaciers and perpetual snow fields, and a portion of the surrounding verdant forests together with a narrow strip along the beautiful Washington coast.*” (H.R. 2247, 1938).

Ozette Lake area

A boundary adjustment would be proposed to protect park resources within and along the eastern shoreline of Ozette Lake, including water quality, fisheries (e.g. the threatened Ozette Lake sockeye and the rare Olympic mudminnow), native and rare plants, wildlife and the viewshed. The remainder of the Lake Ozette watershed would be protected by a cooperative public land conservation strategy that would be used to protect the three elk herds that inhabit the watershed, the water quality of the lake, scenic values, and the natural resource values of the watershed, including 17 species of plants that are considered rare within the park and 10 other species on the Washington State rare plant list.

The lands of the Ozette watershed, except those within the narrow shoreline corridor surrounding Ozette Lake within Olympic National Park, are generally managed for commercial timber production. These forest lands are a mixture of private and Washington State ownership and are managed in accordance with Washington State forest practice rules developed under the 1999 “Forest and Fish Report” or the 1996

Washington Department of Natural Resources (DNR) *Habitat Conservation Plan* (HCP) and/or the *Forest Practices Habitat Conservation Plan* (2006). In general, these rules are intended to provide for an economically viable timber industry in Washington State, while ensuring compliance with the Endangered Species Act (ESA) for aquatic and riparian-dependent species, and the Clean Water Act (CWA).

The purpose of the ESA is to “provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved, to provide a program for the conservation of such endangered species and threatened species....” The goal of the CWA is to “restore and maintain the chemical, physical and biological integrity of the Nation’s waters.” These objectives are very similar to the purpose of national parks, but differ in a key way. National parks are intended “. . . to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” (16 USC I). The requirement to broadly leave resources and scenery unimpaired implies a high level of protection across the entire landscape, not limited to a single species or component of the landscape. In some, but not all cases, the intention of the Organic Act may be completely in line with the intentions of ESA or the CWA. For example, the U.S. Fish and Wildlife Service (FWS) may find that a proposed action does not constitute “jeopardy” for a listed species. However, if the same action dramatically reduced the abundance of that species within a park, while maintaining or increasing abundance elsewhere, the action would not be consistent with the Organic Act.

During the development of general management plans, it is necessary and appropriate for the National Park Service to determine whether existing conditions provide adequate protection for park resources, or if additional protection is warranted such that land acquisition or other management approaches should be considered.

The following three questions are a synthesis of the comments received during the public review of the draft general management plan. The responses were formulated primarily to address comments related to the Ozette Lake area:

- 1) What would be the long term effect on park resources that we are trying to protect within the current park boundary, if the acreage within the proposed boundary adjustment remains in private timber production (consider the maximum actions that would be allowed under the Forest/Fish regulations and the HCP provisions).
- 2) What would be the long term effect on park resources that we are trying to protect within the current park boundary, if the acreage within the proposed boundary adjustment becomes part of the park and is actively restored to remove roads and attain structural complexity? Further, what additional benefits to the park might be gained on the newly-added lands themselves?
- 3) What would be the long term effect on park resources that we are trying to protect within the current park boundary, if the acreage within the proposed boundary adjustment is taken out of timber production and becomes developed for housing or other uses?

The following responses to the above questions focus on the Lake Ozette Watershed, but are also broadly applicable to all lands included within the proposed boundary adjustments near the Lyre River at Lake Crescent, along the South Fork Hoh River, and in the Queets Watershed.

- 1) What would be the long term effect on park resources that we are trying to protect within the current park boundary, if the acreage within the proposed boundary adjustment remains in private timber production (consider the maximum actions that would be allowed under the Forest and Fish regulations and the HCP provisions).

The 1997 DNR HCP and the 1999 Forest and Fish Report were the basis for sweeping modifications to the forest practices rules governing timber harvest on State and private lands in Washington State. In some cases these revisions improved forest regulations to clearly protect other resources dependant upon functioning forest habitat. In other cases, the changes are difficult to evaluate or appear to be a step backward from rules in effect under the Timber Fish and Wildlife agreement.

The most beneficial components of these documents are the provisions for road construction and road maintenance. The new rules ensure that all stream crossings provide adequate protection for fish passage and that new road drainage systems minimize the potential for catastrophic road failure or delivery of sediment to streams. However, forest roads will continue to have an effect on the landscape, hydrology, and fisheries resources.

The forest practice rules have also been modified to more fully address timber harvest in riparian areas and around other critical habitat such as marbled murrelet and spotted owl nest sites, unstable slopes, and wetlands. The standards differ between the DNR-*Habitat Conservation Plan* and the “Forest and Fish Report” rules in regard to the type of critical area protected. In general, these critical areas are protected by rules that identify a core zone where no timber harvest is allowed and establish a broader buffer area where limited harvest is allowed.

The forest practice rules minimize requirements for land managers to directly address cumulative watershed effects from multiple forest activities, dispersed spatially and in time, within individual watersheds. The use of Washington State watershed analysis methodology is not required, but may be used voluntarily by interested parties.

Given that ecosystem response to forest practices may be extended over a period of decades, there are many unknown or disputed effects that lead to uncertainty regarding the ability of the rules to protect key resources and habitat function. The Cooperative Monitoring, Evaluation, and Research Committee (CMER) has identified at least 16 areas of interest (CMER, 2006), while others have identified a number of other areas of concern (AFS and SER, 2000), including stream temperature, alterations to peak flows, and cumulative affects. These questions are to be addressed through the monitoring and adaptive management approaches outlined in the two documents and implemented by the CMER. The stated objectives of the adaptive management program are to provide:

- Certainty of change as needed to protect targeted resources;
- Predictability and stability of the process of change so that landowners, regulators and interested members of the public can anticipate and prepare for change;
- Application of quality controls to study design and execution and to the interpreted results.

The objectives of the approach are laudable, and CMER has identified a work plan to address some of the most pressing questions. However, as yet only one modification to the WAC has been made as the result of the adaptive management provisions of the forest practice rules (DNR, 2006). Additionally, there may continue to be disputes over the interpretation of study results (e.g. importance of certain issues) with little leeway for alternative research or interpretation to be incorporated into rule changes.

Although the forest practice regulations provide protective measures for important habitat, the benefit from the regulations can only be achieved through the proper implementation of and compliance with the regulations. In 2006, nearly 20% of all forest practices reviewed were out of compliance with the regulations, and more than 25% of all riparian activities out were of compliance (Lingley and Tausch, 2006).

Fish

The following provides a brief description of potential effects on the fisheries resources of the Lake Ozette Watershed if upland areas continue to be managed under the existing forest practice rules. The discussion includes effects associated with sediment, road construction, shading, and alterations to peak flow events.

Under existing forest practice rules, which apply to forest lands adjacent to the park at Ozette, over time the fisheries resources in the Ozette watershed should receive greater protection than provided by past rules, particularly from improved road maintenance requirements and changes that encourage recruitment (and placing) large woody debris into larger stream channels. Additionally, forest and riparian lands will continue

to be actively managed to achieve known desired future conditions that exceed standards of past forest management practices. Nonetheless, cumulative effects of the protective measures provided by the forest practice rules are at best speculative and unknown in relation to the higher NPS objectives, and at worst insufficient to ensure the long-term protection of fisheries and aquatic resources, especially when compared to levels mandated by NPS laws and policies.

As an example, not all aspects of riparian function are protected under the existing forest practice rules. The rules provide standards for riparian buffers around fish-bearing and non-fish-bearing streams. Along non-fish-bearing (type N) streams, a 50-foot no-harvest buffer is provided along the first 500 feet of the stream, or the first 50% of the stream for streams between 300 and 1,000 feet long. Beyond this distance, no buffer is required. Additionally, even in the protected riparian zones for both fish-bearing and non-fish-bearing streams, harvest may be allowed to facilitate (1) an unrestricted number of road crossings, and (2) yarding corridors.

These buffer requirements cause uncertainty regarding the potential sediment delivery to Lake Ozette. Because sediment on the sockeye spawning grounds of the lake has been identified as a limiting factor for the recovery of sockeye (Jacobs et al. 1996, Haggerty et al. 2007), this uncertainty is cause for concern. According to the DNR stream database, there are approximately 350 linear miles of rivers and streams in the Ozette watershed. Of this, about 195 miles (more than 50%) is classified as type N streams. Under the existing rules, as much as 110 miles or more of these streams (32% of the total known stream length in the watershed) could be left without any riparian timber buffer, not including areas needed for road crossings or yarding corridors. Although the type N streams are usually quite small, and may be seasonal in nature, they can collectively contribute a large amount of sediment to the larger streams - and ultimately, Lake Ozette - during high flows (May and Gresswell, 2003).

The CMER has recognized this uncertainty as well, and has identified the ability of type-N buffer characteristics to provide desired riparian integrity and function as the number one priority for its Effectiveness/Validation program. They felt that there was a high risk to the resource with a high level of uncertainty regarding the science and/or assumptions underlying the rule (CMER, 2006).

The 1999 "Forest and Fish Report" recognizes that forest practices, and roads in particular, affect the delivery of sediment to fish-bearing streams. The rules adopted after the report allow for an increase in sediment loading from old roads up to 50% above natural background levels (schedule L-1). During summer low flows, this may be an insignificant increase. During winter storms, a 50% increase in sediment loading could represent the delivery of a large quantity of sediment to spawning areas (Herrera, 2006). Additionally, the standard assumes that the underlying natural background level is known; this level is not known for Ozette Lake.

The new road standards for forest practices direct that there be a decrease in the amount of road runoff entering streams. This is accomplished by diverting road surface runoff onto hill slopes rather than directly into stream channels. This redirection may be inadequate to prevent surface flow from entering streams during storms, especially when the roads are near streams. Further, the redirection can cause other problems, such as hill-slope gullying, which significantly increases sedimentation. Diversion of surface runoff can also increase sediment delivery to Ozette Lake.

In addition to the potential for forest roads to continue to deliver sediment to the local streams, these roads will continue to alter basin hydrology through the interception of surface and groundwater (Herrera, 2006). Although some road management practices can reduce the amount of road runoff directly entering streams, these practices cannot eliminate road runoff into streams. This road runoff, independently or in combination with overland flow from recently harvested areas, affects peak stream flow (Bowling and Lettenmaier 1997, Heeswijk et al. 1996, Storck et al. 1995, Coffin and Harr 1992). The "Forest and Fish Report" addresses this by establishing a resource objective that two-year peak flow events not be increased more than 20% as a result of forest practice actions (schedule L). However, it is not clear that the new rules contain adequate assurances that the reductions in runoff will be either significant or adequate in watersheds such as Lake Ozette (which has many roads and recent logging) to meet the objective, or if this standard is adequate to protect fish and

other aquatic resources. A two-year peak flow is capable of transporting the gravel and cobble in the streambed, which can damage the eggs, resulting in mortality of in-gravel eggs and alevin. Thorne and Ames (1987) found that sockeye egg survival decreased dramatically with increasing maximum peak flow during the incubation period - a 20% increase in peak flow was calculated to result in an 11% reduction in fry production. A similar reduction in fry production was found by Holtby and Healey (1996) for Carnation Creek. For tributary spawning sockeye in the Lake Ozette watershed, increased peak flows could represent a significant decrease in fry production, increasing recovery time and/or reducing carrying capacity below historic levels.

Cumulative effects of roads can include the potential for pesticide contamination of Ozette Lake through routine use of herbicides to control vegetation. There are about 420 miles of road in the Ozette Watershed, or about 5.5 miles of road per square mile (mi/mi^2) (Haggerty et al, 2007). On non-federal lands only, the road density exceeds $6 \text{ mi}/\text{mi}^2$. Evidence suggests a strongly negative correlation between road densities and fish production (Sharma and Hilborne, 2001; Thompson and Lee, 2000; Pess, et al, 2002), with densities as low as $1.6 \text{ mi}/\text{mi}^2$ having an identifiable effect on the fisheries resource (Thompson and Lee, 2000). NOAA Fisheries' 1996 guidance document for salmon restoration initiatives (NOAA, 1996), describes basins with road densities of 2-3 mi/mi^2 as being "at risk" while basins with road densities of greater than 3 mi/mi^2 are described as "not properly functioning".

In streams that will be moderately protected by riparian buffers, there remains some question as to whether these buffers will provide the stated desired future conditions (Shuett-Hames, et al, 2005) or whether the buffers are adequate to meet requirements for restoring large woody debris to the channel and/or reduce stream temperatures. Evidence suggests that stream temperature is more closely related to the ambient air temperature than to solar radiation (Sullivan et al, 1990; Theurer et al, 1984). Ambient temperature in at the margin of a clearing may be substantially higher than temperatures in the interior, with the temperature remaining elevated for up to several hundred feet (Chen et al, 1995). Therefore, though riparian buffers may be adequate to provide shade and cover, they may not be adequate to provide the cooling affect of a mature forest stand, leading to increased stream temperatures.

Olympic mudminnows occur only in Washington State and are restricted to coastal lowlands from Ozette Lake south to Grays Harbor and the Chehalis Basin. Mudminnows typically occur in lowland bogs, swamps, creeks, and lakes. In 1999 the Olympic mudminnow was designated as a state-listed sensitive species (WAC 232-12-297). In the Lake Ozette basin, the relative influences of past land management practices on mudminnows remains unknown. However, mudminnows are highly vulnerable to extirpation based on their limited range and because their localized habitats may be easily filled and destroyed. All known habitat for Olympic mudminnow, including Quinn Creek, would be encompassed within the proposed expanded park boundary.

Native Plant Community

If the area within the proposed boundary adjustment remains in private timber production, there will also be a continuing risk of colonization of park land by invasive, exotic plants and negative effects on a state-threatened plant species that grows in the waters of Ozette Lake. A recent study of forests of the western Olympic Peninsula showed that exotic plant species accounted for 20% of the flora of areas in the first 20 years of regeneration following timber harvest and were absent from late-seral stands (>200 years old) (Tyler and Peterson 2006). The study included the area from the Bogachiel River to the Humptulips River and found that the regeneration phase was common on private lands (19% of the area). Given the customary short interval between harvests, much of the area within the proposed boundary adjustment would likely remain in the regeneration phase if management for timber production by private owners continues. Therefore, these areas are likely to harbor invasive, exotic plant species that could invade the park.

Water lobelia (*Lobelia dortmanna*) is an aquatic plant known to occur in nine lakes in western Washington (Washington Natural Heritage Program and U.S. Department of the Interior, Bureau of Land Management 2007), including portions of the Ozette Lake shoreline adjacent to the proposed boundary adjustment. It is

listed by the Washington Natural Heritage Program as state-threatened (likely to become endangered in Washington). Major threats include herbicides used to control aquatic weeds, shoreline development, water pollution, and trampling. Water lobelia is intolerant of shade. Algae growing as epiphytes on its leaves reduces photosynthesis and may contribute to its loss in polluted lakes (Sand-Jensen and Borum 1984, Farmer 1989). As described above, with continued management for timber production under existing rules, sediment delivery to Ozette Lake will likely continue. Sediment delivery presents a risk to water lobelia due to burial, sediment deposition on leaves, and shading of submerged plants due to increased turbidity.

Wildlife

Because the existing forest and fish regulations focus on the requirements of the Endangered Species Act and protecting water quality, there are few specific standards for wildlife management on private lands, particularly in upland areas. Recommendations for upland management areas include leaving at least 2 acres per 160 acres harvested intact, with trees and understory vegetation, during the current and next harvests. Also, due to the great number of riparian areas in western Washington forests, the regulations project that the riparian reserves would also serve as forested reserves for upland areas. These management provisions do accomplish some positive benefits for wildlife communities that require forested habitats. Because there is a rapid turnover of forest systems through harvest, succession, and subsequent harvest 40 to 60 years later, the landscape mosaic on managed lands, and the associated wildlife communities, will be different from what would be found in unharvested systems. Although most wildlife species native to the Pacific Northwest are able to persist in the temporally and spatially shifting habitat that exists on managed lands, not all species do (see next paragraph). In addition, relative abundance of species that remain is often different compared to unharvested lands (Aubrey et al. 1997).

Some wildlife species depend on forest structure that can only be achieved in older forests containing large live trees, snags, and downed wood (e.g., marbled murrelets, northern spotted owls, Vaux's swift, and pileated woodpeckers). In a landscape that has been through several harvests and where the maximum tree age is 50 years, those elements will eventually be absent. The species that depend on those structures will, consequently, be unable to persist on those lands. Under current management prescriptions, park lands will increasingly become habitat islands, where species that depend on old-growth forests and habitat will be isolated.

- 2) **What would be the long term effect on park resources within the current park boundary, if the acreage within the proposed boundary adjustment becomes part of the park and is actively restored to remove roads and attain structural complexity? Further, what additional benefits to the park might be gained on the newly-added lands themselves?**

The proposed boundary adjustment increases the extent of protected lands around Lake Ozette from several hundred feet to 1 to 2 miles, depending upon location. Much of this land was harvested for commercial timber between 1964 and 2003; the areas along the northern shore boundary were harvested within the last 20 years. The lands in the northeast sections of the watershed (Big River, Coal Creek, and Crooked Creek corridors) were largely harvested prior to 1964, but with the current rotation goal of 40 years, those areas will likely be considered for harvest within the next 10 years.

The stand condition of the lands within the proposed adjustment area is unknown, but it is reasonable to assume (given the harvest history) that the lands are either in early stages of regeneration or are approaching canopy closure. In either case, active management (e.g., silvicultural treatment) would be required to restore conditions consistent with the objectives of the park (ecosystem function).

As noted above, there are about 420 miles of road in the Ozette watershed. Although the proportion of roads within the area proposed for acquisition is unknown, these roads will either need to be maintained or deconstructed to meet park objectives.

A key benefit of land protection is that it would prevent conversion of lands from commercial timber to residential or similar use. Although residential development would be regulated by Clallam County's *Critical*

Areas Ordinance, it would be associated with a higher level of impervious surface, higher level of human activity, and a less mature forest than the current condition or conditions if the lands are protected by park management.

Fish

In general, the lower reaches of all rivers are the most productive and diverse riverine habitats, as gradient tends to decrease with commensurate increases in channel complexity. Protection and restoration of these areas within the proposed boundary adjustment would ensure that, over time, fish habitat in these areas would recover to near historic conditions. Additionally, as the forest included within the boundary area matures, ambient air temperature should decline, with the potential that stream temperatures entering the lake will approximate natural levels.

Outside the proposed boundary adjustment areas, upland management practices would continue to deliver sediment above natural background levels to fish bearing waters and Lake Ozette. As the riparian areas recover, both as a result of acquisition and implementation of riparian buffers on timber lands, some of the increase in sediment load will be stored in the stream channel. However, much of the finest sediment (silts) and a portion of the coarser sediment will reach the lake and may be deposited in sockeye spawning areas. The level to which adjustment of the park boundary might mitigate the quantity of sediment to the lake has not yet been estimated. However, a simple analysis could easily be completed by using the proportion of: 1) acreage; 2) existing road system, and; 3) Type-N streams within the area targeted for acquisition.

Similar to changes in sediment delivery, it is anticipated that stream hydrology will trend towards natural conditions under the GMP proposed action. The reduction in road density within the watershed, as well as an increase in the overall maturity of the forest, will reduce peak flow events from those anticipated under existing forest practice rules. Flows are not likely to be as responsive to the proposed action as sediment delivery, as much of the rain-on-snow zone will remain outside park boundaries. Rain-on-snow events in recently-harvested lands have been found to significantly affect stream flow (Heeswijk, et al 1996). Again, an estimate for expected change in peak flow has not been calculated but could be determined based on the proportion of the watershed acquired and relative proportion of lands within the rain-on-snow zone.

Native Plant Community

If the areas within the proposed boundary adjustment become part of the park, are actively restored (roads are removed), and attain structural complexity, the risk of colonization of park land by invasive, exotic plants would be reduced. Over time, more and more of the area would become older than the regeneration phase. Tyler and Peterson (2006) found that the number of exotic plants was significantly lower in young forests (20-79 years old) than in the regeneration phase. Thus, with the application of forest ecosystem management practices, the areas within the proposed boundary adjustment should become a barrier to invasive, exotic plants. In addition, removing roads would eliminate pathways for dispersal of exotic plants.

Wildlife

The lands in the proposed boundary adjustment areas are, for the most part, in various stages of succession, ranging from recent clear-cuts, through pre-canopy closure, closed-canopy/ stem-exclusion to harvest stage. The pre-canopy stage provides abundant herbaceous and browse forage for many species (e.g., elk, deer mice, and bobcats). Many species are not able to get much value from the later, closed-canopy stage due to a lack of food. In addition, there are other wildlife species that do not use pre-canopy stages or use closed canopy forests. Without harvest, all the lands would pass into the closed canopy stage, and it would be many years until the canopy opened enough to allow the development of understory forage and a multilayered canopy. During that time, both early and late seral wildlife species would be depleted.

However, if the National Park Service instituted a program of active forest ecosystem management, including thinning, the process of succession in forest stands would be greatly accelerated. This would lead to a decrease in time needed for the forested stands to be suitable to wildlife species that depend on old-growth

forests and habitat. In addition, forest openings created by thinning also create enough forage to support species that use early seral forest habitats, such as elk and rodents.

In the long term, these lands would attain the structure and function of late seral forest, and would be better able to support the array of wildlife species that the park was originally set aside to protect. These lands would be better able to support wide-ranging species (with large home range requirements) and support more extensive populations of smaller and less wide-ranging species.

3) What would be the long term effect on park resources within the current park boundary if the acreage within the proposed boundary adjustment is taken out of timber production and becomes developed for housing or other uses?

No formal effort has been made to date to estimate how much of the Lake Ozette watershed might be reasonably converted from commercial timber production to residential or other development. Reasonable estimates of potential conversion could be ascertained by the following:

- a) Evaluation of existing zoning (current Clallam County rules allow 1 house per 80 acres on lands zoned as commercial forest).
- b) Evaluation of existing land in designated as small timber ownership (a 2005 report by John Calhoun claimed that existing rules for small timber owners were overly burdensome and likely to lead to conversion of these lands).
- c) Evaluation of lands with a view of Ozette Lake.
- d) Evaluation of lands suitable for residential development (e.g. not limited by wetlands, unstable slopes, earthquake or channel meander hazards, etc.)
- e) Other methods

In order for lands to be converted from commercial timber to another use (excluding the rules allowing 1 house per 80 acres), three things would need to happen. First, the conversion from commercial forestry to an alternative use would be evaluated according to the rules of the Clallam County Critical Areas Ordinance. Second, the lands would be considered for rezoning through the land use regulations. Finally, rezoning requires a public hearing, with the owner needing to show that the proposed use would be consistent with the conditions existing at the site and consistent with the county land use plan. For example, it is unlikely that zoning would be revised for high residential development if the area proposed for rezoning was located on steep, unstable slopes. Rezoning might also be withheld if the proposed use was inconsistent with other uses in the area (e.g. industrial zoning in a residential neighborhood).

Throughout Clallam County, commercial forest lands have been converted to residential development. How much of the Ozette Watershed might be rezoned is unknown, but it is reasonable to assume that some of the lands would be converted from commercial forest lands to residential or other incompatible land uses in the future.

In general, conversion to residential or other development would lead to increased impervious surfaces, increased roads, reduction of vegetative cover, alterations in basin hydrology, increased input of anthropogenic nutrients and toxins, and increased human activity.

Fish

In general, conversion from commercial forest to other uses would have a negative impact on the fisheries resources in the basin, either directly through land clearing, increased road length, and increased impervious surfaces, or indirectly through increased loading of nutrients and toxins, alterations in watershed hydrology, and increased human activity.

Native Plant Community

If the area within the proposed boundary adjustment is taken out of timber production and becomes developed for housing or other uses, it is likely that park lands would face an increased risk of colonization by invasive, exotic plants.

Conversion of the area to housing or other uses is likely to have detrimental effects on the state-threatened aquatic plant water lobelia. Conversion to housing and other uses may lead to pollution of the water of Ozette Lake, a known threats to water lobelia.

Wildlife

If taken out of timber production and converted to second homes, the lands would have a diminished capacity to support wildlife. There would be a direct loss of available habitat, and displacement of those species that depended on the converted lands. Lands would be permanently removed from the wildlife habitat base. In addition there would be effects from increased human-wildlife conflicts, such as bear/human interactions (garbage and food storage issues), elk use of landscape vegetation and gardens, domestic cats preying on wild birds and mammals, and domestic dogs harassing deer and elk.

Feasibility to Administer the Lands Added through Boundary Adjustment

It is feasible for the National Park Service to administer the land parcels being proposed for addition to the park boundary. The land protection would be accomplished by willing seller / willing buyer arrangements, in accordance with NPS policy.

The land outside the park boundary at Lake Ozette would could be protected by a through cooperative land conservation strategies involving public agencies, tribal governments, and private entities and managed by the state Department of Natural Resources to protect the threatened Ozette Lake sockeye and its critical habitat, the water quality of the lake, scenic values, and the natural resource values of the watershed.

No extensive operational commitment would be required by NPS staff to administer and manage these areas. A modest level of public facilities would be expected. There would not be a need for any public facilities to be located on the acquired lands. The lands are adjacent to existing sites, and the acreage involved in the acquisitions would not result in the need for and therefore would allow for efficient use of existing additional patrol and administrative functions.

There is a restoration need on some of the lands near Ozette due to the presence of unpaved roads in the area. Special funding would be sought to rehabilitate these lands. This would be a short-term need that would result in improved conditions in the watershed and increased protection of park resources. Therefore, the addition of the proposed land areas to the park boundary would be feasible to administer.

Protection Alternatives Considered

The other protection options, other than fee or easement acquisition, fall outside the authority of the National Park Service. Alternatives could include the application of additional local government land use regulations, or exploring other land protection strategies that could involve state, tribal or private sector (e.g. land trust) initiatives.

Proposed Additions to the Park Boundary and Other Adjustments

Under alternative D (preferred alternative), three areas totaling approximately 16,000 acres would be added to the boundary of the park:

- Queets — 2,300 acres

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- Lake Crescent — 1,640 acres
- Ozette — 12,000 acres

In addition, an exchange would be sought with the Washington Department of Natural Resources. Land would be acquired outside the park boundary for the purposes of exchange with the state. The proposed land exchange between the National Park Service and the state of acquired private lands would be in return for the state conveying its interests to the 50,000 acres of subsurface mineral rights within Olympic National Park and approximately of 4,100 acres of scattered surface and subsurface parcels in the Lake Ozette, Lake Crescent, and Queets areas of the park. The NPS would work with the Washington Department of Natural Resources to develop a priority list of lands that would be considered for this exchange.

Authorizing legislation from Congress would be required prior to the adjustment of the boundary outside Olympic National Park and the appropriation of funds to provide for the purchase and exchange of lands within the revised boundary from willing sellers, in accordance with NPS policy.

Authorizing legislation would also be required to allow the National Park Service to acquire private timber lands from willing sellers outside the boundaries of Olympic National Park for purposes of exchange only so that the value and acreages required to exchange for the state ownership of the subsurface mineral rights within Olympic National Park could be accomplished.

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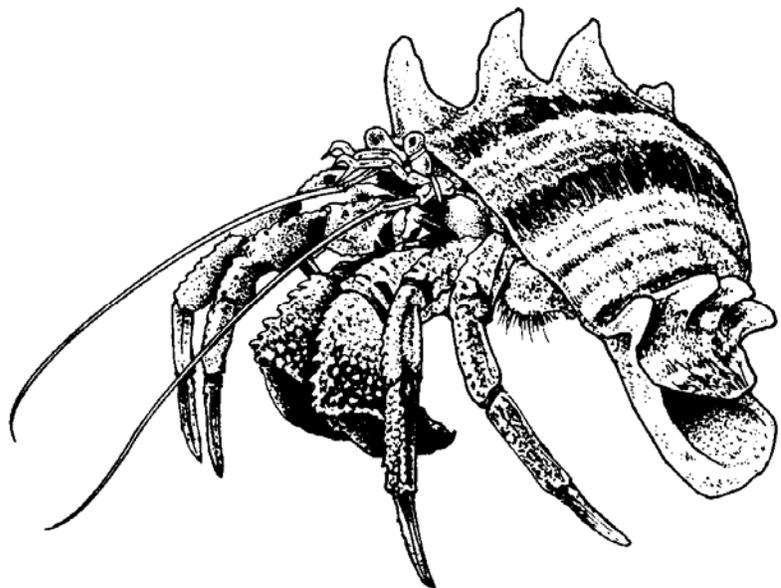
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APPENDIX C: WASHINGTON ISLANDS NATIONAL WILDLIFE REFUGES

The Washington Islands National Wildlife Refuges has long been considered remote and isolated areas. At least seven groups of Native Americans (Makah, Ozettes, Quileutes, Hoh, Queets, Quinault, and Copalis) occupied the outer coast of the Olympic Peninsula adjacent to the present-day Washington Islands Refuges. They depended on the natural resources of the Pacific Ocean as well as the rivers and forests for their subsistence (Ruby and Brown 1992). Washington coastal development by European-Americans began during the late 1800s, but the area remains relatively undeveloped and sparsely populated. There has been little private ownership of any of the islands. Today the population of Forks, the largest town on the west side of the Olympic Mountains, is estimated at 3,500 people (Forks Chamber of Commerce 2000). The Native American populations living on or near the four local Indian reservations are estimated at 1,752 for the Makah Reservation, 2,951 for the Quinault Indian Reservation, 784 for the Quileute Reservation, and 86 for the Hoh Reservation (Northwest Portland Indian Health Board 2003).

The islands that make up the Washington Islands National Wildlife Refuges were first granted federal conservation protection under a seabird reserve system, designated in 1907 by President Theodore Roosevelt (Executive Orders No. 703, 704, 705). The three reservations were renamed as national wildlife refuges in 1940: Flattery Rocks, Quillayute Needles, and Copalis (Presidential Proclamation, July 30, 1940, President Franklin D. Roosevelt as granted under 50 Stat. 917). All three are managed together as the Washington Islands National Wildlife Refuges.

In 1944 the United States Navy was granted use of a number of rocks within the Washington Islands Refuges for bombing and strafing activities (USFWS 1986). White Rock, North Rock, North Sea Lion Rock, South Sea Lion Rock, Carroll Island, Split Rock, Rounded Island, and possibly other islands were all used for this purpose until 1949, when bombing was continued only on South Sea Lion Rock. In 1993 the Navy's use of this area was rescinded by the Secretary of the Interior (NOAA 1993).

In 1967 the Washington Department of Natural Resources signed a resolution prohibiting the

“prospecting, mining, and/or oil and gas exploration activities within one-quarter of one statute mile of any island, islet, reef, or rock within the boundaries of said Refuges” (Resolution Number 76).

The Department of Interior removed James Island, near La Push, Washington, from the Quillayute Needles National Wildlife Refuge in 1966 (Public Land Order 4095) when it was determined to have been included in the lands set aside for the Quileute Reservation in 1889.

In 1970 all three refuges of the Washington Island Refuges were designated as wilderness areas through Public Law 91-504, except for Destruction Island in Quillayute Needles National Wildlife Refuge. This action was undertaken to promote and protect the pristine and remote nature of the islands.

In 1986 Public Law (99-635) expanded and adjusted the boundaries of Olympic National Park. The bill effectively transferred authority over Flattery Rocks and Quillayute Needles refuges to the National Park Service. As a result of pressure from Washington State's scientific and environmental community, another bill to restore the two refuges to the U.S. Fish and Wildlife Service was introduced. In December 1987 Public Law 100-226 restored Flattery Rocks and Quillayute Needles to full national wildlife refuge status, although both are now located within the boundary of Olympic National Park. The bill also called for a cooperative agreement between the U.S. Fish and Wildlife Service and the National Park Service. The two agencies signed a memorandum of agreement in June 1988 (Agreement No. 9500-80001), which outlines the objectives for the Washington Maritime National Wildlife Refuge Complex and the obligation of both agencies. Under this agreement, the U. S. Fish and Wildlife Service maintains management and administration responsibilities; regulates refuge uses; monitors wildlife; works with the National Park Service in developing educational information; notifies the National Park Service of site visits; and exchanges information and training. As a result of the agreement, the National Park Service is obligated to develop informational and educational programs about the Washington Islands refuges; provide law enforcement training for park rangers; monitor trespasses; support the U.S. Fish

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and Wildlife Service's restriction of public and agency access to the refuges; and conduct cooperative scientific research as needed.

The waters surrounding the Washington Islands National Wildlife Refuges were designated a national marine sanctuary in 1994. The Olympic Coast National Marine Sanctuary (sanctuary), encompasses 2,111,992 acres (3,310 sq miles) (854,696 ha [8547 sq km]) of marine waters and extends for 135 miles (217 km) of coastline, thereby incorporating the entire area surrounding the islands and rocks of all three refuges. The jurisdiction covers most of the continental shelf and varies between 25 to 40 miles (40 to 65 km) offshore (NPS 2000). The National Oceanic and Atmospheric Administration (NOAA) manages the sanctuary through guidance contained in the May 1993 *Olympic Coast National Marine Sanctuary Management Plan*.

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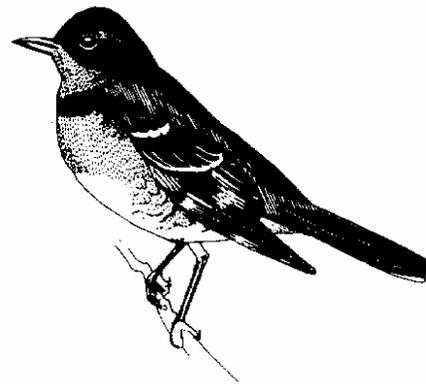
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Executive Order 11988 (“Floodplain Management”) requires the National Park Service and other agencies to evaluate the likely impacts of actions in floodplains. This statement of findings (SOF) has been prepared to comply with EO 11988.

In managing floodplains on park lands, the National Park Service policy is to (1) manage for the preservation of floodplain values; (2) minimize potentially hazardous conditions associated with flooding; and (3) comply with the NPS Organic Act and all other federal laws and Executive orders related to the management of activities in flood-prone areas. This SOF is considered an integral part of the Environmental Impact Analysis analyzing the anticipated impacts of the *General Management Plan*.

PROPOSED ACTION

The proposed action is to implement the preferred alternative of the *Olympic National Park General Management Plan and Environmental Impact Statement*.

The General Management Plan (GMP) is the National Park Service's primary planning document. The management plan performs two critical functions for Park Service managers. First, by describing specific desirable resource conditions and visitor experiences for national parks, it establishes a clear direction for resource preservation and visitor use and proposed alternate management strategies for achieving those goals. Second, by identifying a preferred alternative, the management plan provides a framework to guide park management decision-making for the next 15 to 20 years. NPS management plans are developed in consultation with interested parties including federal, state and local agencies as well as the public.

The GMP provides overall direction for park management but specific actions needed to implement the plan will be provided in subsequent plans. Because the plan is general in nature, floodplain analysis is also general. Site-specific environmental analysis would be completed for individual actions prescribed in the GMP.

The preferred alternative would retain existing facilities in developed areas around the periphery of the park. Actions proposed in the preferred alternative include relocating certain roads or at-risk portions of roads outside the floodplain where feasible and as funding and legislation allows. The Hoh Road could be relocated to a more sustainable location, outside the floodplain, if wilderness boundaries are adjusted through legislation. The Queets Road could be relocated as needed to respond to river movements. Relocation of the roads in the Quinault floodplain and watershed, including North Fork and Graves Creek roads and the North Shore Road at Finley Creek, could occur under the preferred alternative if wilderness boundaries are adjusted, if determined feasible, and if funding is granted. Most of the park development, including visitor facilities (e.g., campgrounds and trailheads) in the Hoh, Elwha, Staircase, and Dosewallips areas would remain in the river floodplains. There could be additional protective measures placed around structures in floodplains, and the Hoh Visitor Center could be modified to improve and protect the facility, or it could be relocated outside the floodplain if a feasible location is identified.

No additional structures or facilities would be constructed in known floodplains except as replacements or for the protection of existing facilities. Land use patterns and visitation levels would not change appreciably from current situations.

SITE DESCRIPTION

Olympic National Park is classified as a temperate rain forest. The majority of the precipitation is found in middle to upper elevations and comes in the form of snowfall. In lower elevations, precipitation typically comes in the form of rain. Often, extended storms are capable of dropping over eight inches of rain in a 24 to 48 hour period.

The rivers and streams within the boundaries of the park have associated floodplains. The upper reaches of these river courses are often steep and are in steep-sided valleys. As the rivers exit the higher mountains, their floodplains are often formed by the braided nature of the streambeds.

High water events have led to streambed movement across the valley bottoms, often putting park roads and facilities at risk from flooding or washout. Floods in 2003 and 2006 caused several roads in the park to washout into the streams. The streambeds of the west side rivers are extremely active and, in some places, the stream banks have been modified (e.g. armored with rip-rap) to prevent the undermining of roads and other facilities.

The park's developed areas include main roads, ranger stations, employee housing, campgrounds, etc. Development in the frontcountry portions of the Elwha, Sol Duc, Hoh, Quinault, Staircase, and Dosewallips is within the floodplain.

These facilities are determined to be in Action Class I according to the definitions in Director's Order 77-2.

JUSTIFICATION FOR CONTINUED USE OF THE FLOODPLAIN

Floodplains lie along the major rivers in the lower elevations of the park. Because of the mountainous terrain, some or all of the park development in the Hoh, Elwha, Quinault, Staircase, and Dosewallips areas are located in 100-year or 500-year floodplains. Development and public use in these areas has been in place for many years. The situations that lead up to flooding of the rivers, and the scope and duration of high water events are well known by park staff.

Actions proposed in the preferred alternative include relocating certain roads or at-risk portions of roads outside the floodplain where feasible and as funding allows. There could be additional protective measures placed around structures in floodplains, and the Hoh Visitor Center could be modified to improve and protect the facility or moved outside the floodplain. The retention of roads, parking, administrative, residential, camping, and maintenance facilities within 100-year floodplains are often functionally dependent on their locations to accommodate visitor or park operation needs.

In addition, moving entire developed areas out of the floodplains would be cost-prohibitive and in most cases, no practicable alternative sites exist where necessary visitor service and park operations facilities could be moved. Individual facilities may be moved when threatened by river movement on a case-by-case basis. For example, if an individual campsite is threatened, the table, grill, etc., would be moved to another location within the campground.

Investigation of Alternative Sites

Under the preferred alternative, feasibility studies would be conducted to determine where roads or portions of roads could be relocated outside the floodplain. If feasible alternatives exist, the park would seek legislation to adjust wilderness boundaries to allow the relocation of all or portions of the roadways at the Hoh, Queets, and Quinault areas of the park. However, if wilderness boundary adjustments are not authorized, and funding is not granted for road relocation projects, the proposed actions may not be feasible. Due to the narrow valleys encountered along these rivers and legal constraints such as designated wilderness, there may be no reasonable alternative sites on which to construct the needed facilities while keeping them in the vicinity where they are needed.

SPECIFIC FLOOD RISKS

Conditions associated with flooding in the locations discussed in this statement are not considered particularly hazardous. Flooding generally occurs in the park during winter months in periods of low visitation. Flooding is usually a result of prolonged rainfall or rainfall over snowfields, making warning and evacuation a practical option for protection of human life.

Park development in the floodplains has been in place for many years and the situations, scope, and duration of flooding of the rivers are well known by park staff. The timing, depth, and velocity of floodwaters vary by location and will be considered when preparing individual evacuation plans.

An evacuation plan for each area would be prepared to identify high ground safe areas and evacuation routes. In the event that it should become necessary to evacuate visitors and NPS personnel, it could be accomplished along paved, two-lane access roads unless the roads are damaged or portions destroyed due to flood events.

There would be no additional storage facilities for fuels or toxic materials, or museum collections in a floodplain as a result of the preferred alternative.

MITIGATION

An evacuation plan for each developed area in a floodplain would be prepared to identify high ground safe areas and evacuation strategies. Water levels would be monitored by park staff and, if flooding is eminent, visitors would be informed of evacuation procedures.

No major new construction in floodplains is prescribed in the preferred alternative. If minor construction is needed, site-specific environmental analysis would be conducted and would address potential impacts to floodplains. In case-by-case instances, some small buildings or other facilities would be moved away from flood hazard areas when threatened by river movement.

SUMMARY

The National Park Service has determined that implementing the preferred alternative could result in additional disruption of floodplains if road relocations are not possible and protective measures are implemented (e.g., rip rap and engineered log jams) through time to maintain or reconstruct roads and facilities within the floodplain. Risk to life from flooding can be mitigated.

The NPS would allow existing structures to remain in their current locations unless there are reasonable alternative locations. No additional structures or facilities would be constructed in known floodplains except for the replacement or protection of existing facilities. Water levels would be monitored by park staff. Visitors would be informed of changes caused by heavy precipitation events through regular interpretation and local media.

Therefore, implementing the proposed action could have both long-term beneficial effects on floodplains where roads and facilities are removed and the floodplain is restored, and long-term adverse impacts on floodplains and their associated values where facilities and roads remain within the floodplain and additional protective measures are implemented.

The environmental impact statement, this statement of findings for Executive Order 11988, and the signed "Record of Decision," would complete the requirements for the National Environmental Policy Act for this general management plan.

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APPENDIX E: LIST OF CLASSIFIED STRUCTURES FOR THE PARK

This appendix includes the structures that are listed and those that have been determined eligible pending listing, for the List of Classified Structure (LCS). Properties included in the LCS are either on or eligible for listing on the national register, or are to be treated as cultural resources by law, policy, or decision reached through the planning process even though they do not meet all national register requirements. This list reflects the status of historic structures at the time of publication, and will be modified in the future as eligible structures are added to the LCS list, as more research is conducted and future structures become eligible, or as structures that have been determined to be ineligible are removed from the list.

Note: This table has been updated since the draft document was printed.

Preferred Structure Name	Park No.	LCS No.	NR Status	NR Date	Condition	Certified
Altaire Campground, Community Kitchen	202	30090	Entered - Doc.	7/13/2007	Good	2007
Anderson Pass Shelter	263	100621	Det. Elig. - SHPO	1/11/2001	Fair	2007
Bear Camp Shelter	337	601593	Det. Elig. - SHPO	3/5/2007	Poor	2007
Blue Glacier Shelter #1	323	601412	Det. Elig. - SHPO	3/5/2007	Poor	2007
Blue Glacier Shelter #2	324	601447	Det. Elig. - SHPO	3/5/2007	Fair	2007
Botten Cabin	215	30091	Entered - Doc.	7/13/2007	Fair	2007
Canyon Creek Shelter	311	30297	Entered - Doc.	7/13/2007	Good	2007
Deer Park Shelter No 2	167	9026	Det. Elig. - SHPO	1/11/2001	Good	2007
Deer Park Shelter No.1	166	9025	Det. Elig. - SHPO	1/11/2001	Good	2007
Dodger Point Fire Lookout	194	30088	Entered - Doc.	7/13/2007	Good	2007
Eagle Guard Station, Rock Walls	T009	30273	Entered - Doc.	7/13/2007	Good	2007
Eagle Range Station, Residence	172	9020	Entered - Doc.	7/13/2007	Good	2007
Eagle Ranger Station, Garage	173	9021	Entered - Doc.	7/13/2007	Good	2007
Eagle Ranger Station, Generator House	174	30106	Entered - Doc.	7/13/2007	Fair	2007
Elk Lake Shelter	999	601453	Det. Elig. - SHPO	3/5/2007	Fair	2007
Elk Lick Lodge	701	30093	Entered - Doc.	7/13/2007	Fair	2007
Elkhorn Guard Station, Barn	188	30087	Entered - Doc.	7/13/2007	Good	2007
Elkhorn Guard Station, Residence	185	30085	Entered - Doc.	7/13/2007	Good	2007
Elkhorn Guard Station, Shelter	300	30092	Entered - Doc.	7/13/2007	Fair	2007
Elkhorn Guard Station, Wood Shed	187	30086	Entered - Doc.	7/13/2007	Good	2007
Elwha Campground, Community Kitchen	200	30089	Entered - Doc.	7/13/2007	Good	2007
Elwha Campground, 5 Stone & Mortar Water Faucets	T011	30279	Entered - Doc.	7/13/2007	Fair	2007
Elwha Ranger Station, Bunkhouse Woodshed	30	9013	Entered - Doc.	7/13/2007	Good	2007
Elwha Ranger Station, Equipment Repair Shop	37	9017	Entered - Doc.	7/13/2007	Good	2007
Elwha Ranger Station, Equipment Shed	36	9016	Entered - Doc.	7/13/2007	Good	2007

Appendix E: List of Classified Structures

Preferred Structure Name	Park No.	LCS No.	NR Status	NR Date	Condition	Certified
Elwha Ranger Station, Equipment Shed (1936)	559	30083	Entered - Doc.	7/13/2007	Good	2007
Elwha Ranger Station, Fire Cache and Storage	35	9015	Entered - Doc.	7/13/2007	Good	2007
Elwha Ranger Station, Gas and Oil Building	34	9014	Entered - Doc.	7/13/2007	Good	2007
Elwha Ranger Station, Horse Barn	38	9018	Entered - Doc.	7/13/2007	Good	2007
Elwha Ranger Station, Lean-To Shed	1239	30084	Entered - Doc.	7/13/2007	Good	2007
Elwha Ranger Station, Mechanic's House	27	9009	Entered - Doc.	7/13/2007	Good	2007
Elwha Ranger Station, Office	25	9007	Entered - Doc.	7/13/2007	Good	2007
Elwha Ranger Station, Residence	26	9008	Entered - Doc.	7/13/2007	Good	2007
Elwha Ranger Station, Residence #28	28	9012	Entered - Doc.	7/13/2007	Good	2007
Elwha Ranger Station, Residence 27 Woodshed	31	9010	Entered - Doc.	7/13/2007	Good	2007
Enchanted Valley Chalet	207	30112	Entered - Doc.	7/13/2007	Fair	2007
Fifteen Mile Shelter	281	30098	Entered - Doc.	7/13/2007	Fair	2007
Glines Canyon Dam Complex Dam and Spillway	1554	448487	Entered - Doc.	12/15/1988	Good	2007
Glines Canyon Dam Complex Gate House	1553	459199	Entered - Doc.	12/15/1988	Good	2007
Glines Canyon Dam Complex Intake Structure	1554	358381	Entered - Doc.	12/15/1988	Good	2007
Glines Canyon Dam Complex Penstock	1554	457499	Entered - Doc.	12/15/1988	Good	2007
Glines Canyon Dam Complex Powerhouse	1552	469668	Entered - Doc.	12/15/1988	Good	2007
Glines Canyon Dam Complex Surge Tank	1554	362940	Entered - Doc.	12/15/1988	Good	2007
Graves Creek Ranger Station	133	30269	Entered - Doc.	7/13/2007	Good	2007
Graves Creek Ranger Station Flagpole	TBD	602219	Det. Elig. - SHPO	6/18/2004	Fair	2007
Graves Creek Ranger Station Flagstone Path	TBD	602207	Det. Elig. - SHPO	6/18/2004	Fair	2007
Graves Creek Ranger Station, Garage/Woodshed	134	30270	Entered - Doc.	7/13/2007	Good	2007
Graywolf Falls Shelter	287	30274	Det. Elig. - SHPO	7/1/2005	Fair	2007
Happy Four Shelter	288	30099	Entered - Doc.	7/13/2007	Good	2007
Happy Hollow Shelter	995	601216	Det. Elig. - SHPO	3/5/2007	Fair	2007
Hayes River Fire Cache	190	30323	Entered - Doc.	7/13/2007	Good	2007
Hayes River Patrol Cabin	1013	601236	Det. Elig. - SHPO	3/5/2007	Good	2007
Hoh Visitor Center	112	473939	Det. Elig. - SHPO	12/6/2002	Good	2007
Humes Ranch Cabin	699	1192	Entered - Doc.	9/14/1977	Fair	2006
Hyak Shelter	295	30100	Entered - Doc.	7/13/2007	Good	2007
Kestner Homestead Bridge	1558	473808	Entered - Doc.	7/13/2007	Good	2007
Kestner Homestead Fences	1558	473906	Entered - Doc.	7/13/2007	Fair	2007

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Preferred Structure Name	Park No.	LCS No.	NR Status	NR Date	Condition	Certified
Kestner Homestead House	1558	473373	Entered - Doc.	7/13/2007	Fair	2007
Kestner Homestead Oil House	1559	473796	Entered - Doc.	7/13/2007	Fair	2007
Kestner Homestead Root House / Tack Shed	1557	473725	Entered - Doc.	7/13/2007	Fair	2007
Kestner Homestead Smoke House / Utility Shed	1556	473766	Entered - Doc.	7/13/2007	Good	2007
Kestner Homestead Three-Point Swinging Gate	1558	473896	Entered - Doc.	7/13/2007	Poor	2007
Kestner Homestead Vehicle Repair Shed/Oil Rack	1558	473930	Entered - Doc.	7/13/2007	Fair	2007
Lake Crescent Lodge	654	9005	Entered - Doc.	7/13/2007	Good	2007
Lake Crescent Lodge Rubblestone Wall	TBD	601971	Entered - Doc.	6/18/2004	Fair	2007
Lake Crescent Lodge Tennis Court Pad	TBD	601987	Entered - Doc.	6/18/2004	Poor	2007
Lake Crescent Lodge Fireplace Cabin #1	661	30328	Entered - Doc.	7/13/2007	Good	2007
Lake Crescent Lodge Fireplace Cabin #2	662	30329	Entered - Doc.	7/13/2007	Good	2007
Lake Crescent Lodge Fireplace Cabin #3	664	30330	Entered - Doc.	7/13/2007	Good	2007
Michael's Cabin	698	17101	Entered - Doc.	7/13/2007	Fair	2007
Mink Lake Shelter	996	601473	Det. Elig. - SHPO	3/5/2007	Poor	2007
North Fork Quinault Hitching Post and Corral	TBD	601885	Entered - Doc.	7/13/2007	Fair	2007
North Fork Quinault Ranger Station Barn	178	30111	Entered - Doc.	7/13/2007	Good	2007
North Fork Quinault Ranger Station Garage	176	30110	Entered - Doc.	7/13/2007	Good	2007
North Fork Quinault Ranger Station Residence	175	30109	Entered - Doc.	7/13/2007	Good	2007
North Fork Soleduck Shelter	2030	30108	Entered - Doc.	7/13/2007	Good	2007
Olympus Guard Station, Shelter	992	599551	Det. Elig. - SHPO	1/11/2001	Good	2007
Olympus Guard Station, Wood Shed	TBD	601621	Inelig. - Man. as Res.		Good	2007
Olympus Guard Station, Ranger Station	304A	9022	Det. Elig. - SHPO	7/1/2005	Good	2007
Park Headquarters, Administration Building	1	9023	Entered - Doc.	7/13/2007	Good	2007
Park Headquarters, Eight Stone Lanterns	T010	30275	Entered - Doc.	7/13/2007	Fair	2007
Park Headquarters, Equipment and Supply Storage Building	1000	30097	Entered - Doc.	7/13/2007	Good	2007
Park Headquarters, Equipment Shed /Carpenter Shop	5	30095	Entered - Doc.	7/13/2007	Good	2007
Park Headquarters, Gas & Oil House	3	30094	Entered - Doc.	7/13/2007	Good	2007

Appendix E: List of Classified Structures

Preferred Structure Name	Park No.	LCS No.	NR Status	NR Date	Condition	Certified
Park Headquarters, Superintendent's Residence	2	9024	Entered - Doc.	7/13/2007	Good	2007
Park Headquarters, Transformer Vault and Pumphouse	4	30096	Entered - Doc.	7/13/2007	Good	2007
Pelton Creek Shelter	307	30104	Entered - Doc.	7/13/2007	Fair	2007
Peter A Roose Homestead Barn, Ozette	1219	9003	Entered - Doc.	7/13/2007	Good	2007
Peter A Roose Homestead House, Ozette	1217	9001	Entered - Doc.	7/13/2007	Good	2007
Peter A Roose Homestead Root House, Ozette	1218	9002	Entered - Doc.	7/13/2007	Good	2007
Peter A. Roose Homestead Fence, Ozette	T008	30268	Entered - Doc.	7/13/2007	Poor	2007
Peter A. Roose Homestead Well, Ozette	T007	30267	Entered - Doc.	7/13/2007	Good	2007
Pyramid Peak A.W.S. Lookout	709	30282	Entered - Doc.	7/13/2007	Poor	2007
Rosemary Inn	372	21002	Entered - Doc.	7/17/1979	Good	2007
Rosemary Inn, Alabam Cabin	376	21006	Entered - Doc.	7/17/1979	Good	2007
Rosemary Inn, Bird Bath	T001	30226	Entered - Doc.	6/18/2004	Good	2007
Rosemary Inn, Boat House	399	21022	Entered - Doc.	7/17/1979	Good	2007
Rosemary Inn, Cara-Mia Cabin	382	21012	Entered - Doc.	7/17/1979	Good	2007
Rosemary Inn, Dardanella Cabin	388	21017	Entered - Doc.	7/17/1979	Good	2007
Rosemary Inn, Dixie Cabin	383	21013	Entered - Doc.	7/17/1979	Good	2007
Rosemary Inn, Dreamerie Cabin	374	21004	Entered - Doc.	7/17/1979	Good	2007
Rosemary Inn, Entrance Gate	370	21000	Entered - Doc.	7/13/2007	Good	2007
Rosemary Inn, Fire Hydrant in Strolling Garden	T004	30229	Entered - Doc.	6/18/2004	Good	2007
Rosemary Inn, Fireplace Shelter	398	21021	Entered - Doc.	7/17/1979	Good	2006
Rosemary Inn, Honeysuckle Cabin	377	21007	Entered - Doc.	7/17/1979	Good	2007
Rosemary Inn, Indiana Cabin	375	21005	Entered - Doc.	7/17/1979	Good	2007
Rosemary Inn, Manager's Residence	373	21003	Entered - Doc.	7/17/1979	Good	2006
Rosemary Inn, Red Wing Cabin	380	21010	Entered - Doc.	7/17/1979	Good	2007
Rosemary Inn, Rock Wall in Strolling Garden	T002	30227	Entered - Doc.	6/18/2004	Fair	2007
Rosemary Inn, Rock-A-Bye Cabin	386	21015	Entered - Doc.	7/17/1979	Good	2007
Rosemary Inn, Silver Moon Cabin	381	21011	Entered - Doc.	7/17/1979	Good	2007
Rosemary Inn, Stone Fountain in Strolling Garden	T003	30228	Entered - Doc.	6/18/2004	Fair	2007
Rosemary Inn, Summerie Cabin	384	21014	Entered - Doc.	7/17/1979	Good	2006
Rosemary Inn, Sundial in Strolling Gardens	T005	30230	Entered - Doc.	6/18/2004	Poor	2007
Rosemary Inn, Windmill	T006	30231	Entered - Doc.	7/17/1979	Fair	2007

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Preferred Structure Name	Park No.	LCS No.	NR Status	NR Date	Condition	Certified
Rosemary Inn, Wren Cabin	378	21008	Entered - Doc.	7/17/1979	Good	2007
Snow Dome	TBD	601611	Det. Elig. - SHPO	3/5/2007	Fair	2007
Starbuck Creek Lookout / Cabin	2032	30271	Det. Elig. - SHPO	8/28/1994	Poor	2007
Storm King Guard Station	192	30107	Entered - Doc.	7/13/2007	Good	2007
Three Forks Shelter	317	30103	Entered - Doc.	7/13/2007	Good	2007
Toleak Point Shelter	TBD	602310	Inelig. - Man. as Res.		Fair	2007
Trapper Shelter	993	601581	Det. Elig. - SHPO	3/5/2007	Fair	2007
Twelve Mile Shelter	994	601460	Det. Elig. - SHPO	3/5/2007	Fair	2007
Twenty-one Mile Shelter	321	30102	Det. Elig. - SHPO	7/1/2005	Poor	2007
Wendel Boat House	1261	30327	Entered - Doc.	7/13/2007	Poor	2007
Wendel House	1260	30326	Entered - Doc.	7/13/2007	Poor	2007
Wilder Shelter	335	601399	Det. Elig. - SHPO	3/5/2007	Fair	2007

LEGEND

Det. Elig. — SHPO Determined Eligible for listing on the National Register of Historic Places by the State Historic Preservation Officer

Entered.- Doc. Entered on the National Register of Historic Places and Documented

Inelig. - Man. As Res. Ineligible for listing on the National Register of Historic Places - Manage as an Historic Resource



APPENDIX F: PARK CULTURAL LANDSCAPES INVENTORY STATUS

October 7, 2005

Certified Cultural Landscape Inventories	Date Certified
Graves Creek Ranger Station	6/18/2004
Lake Crescent Lodge	6/18/2004
Park Headquarters	6/18/2004
Rosemary Inn	6/18/2004
Potential Cultural Landscapes	
Altair Campground	
Deer Park Ranger Station and Campground	
Eagle Guard Station	
Elkhorn Ranger Station	
Elwha Campground	
Elwha Ranger Station	
Elwha River Hydroelectric Project	
Elwha Dam and Powerhouse	
Glines Canyon Dam and Powerhouse	
Enchanted Valley Chalet	
Graves Creek Campground	
Heart O' the Hills Campground	
Heather Park Chalet and Campground	
Hume's Ranch	
July Creek Campground	
Kestner-Higley Homestead	
La Poel Campground	
Mora	
The Magician's Site - Mora	
North Fork Quinault Campground	
North Fork Quinault Ranger Station	
Olympic Hot Springs Resort and Campground	
Olympus Guard Station	
Queets Corridor	
Roose's Homestead	
Sol Duc Campground	
USFS Trail System	

**APPENDIX G: STATE AND FEDERAL LISTED SPECIES IN OLYMPIC
NATIONAL PARK**

(April 2007)

WILDLIFE SPECIES OF CONCERN

SPECIES	FEDERAL STATUS	STATE STATUS	Notes
Brown pelican (<i>Pelicanus occidentalis</i>)	Endangered	Endangered	
Gray wolf (<i>Canis lupus</i>)	Endangered	Endangered	Extirpated
Marbled murrelet (<i>Brachyramphus marmoratus</i>)	Threatened	Threatened	
Northern bald eagle (<i>Haliaeetus leucocephalus</i>)	Threatened	Threatened	Proposed for delisting
Northern spotted owl (<i>Strix occidentalis caurina</i>)	Threatened	Endangered	
Stellar sea lion (<i>Eumetopias jubatus</i>)	Threatened	Threatened	
Mazama pocket gopher (<i>Thomomys mazama</i>)	Candidate	Candidate	Endemic
Streaked horned lark (<i>Eremophila alpestris strigata</i>)	Candidate	Candidate	
Whulge (Edith's) checkerspot (<i>Euphydras editha taylori</i>)	Candidate	Candidate	
Pacific fisher (<i>Martes pennanti pacifica</i>)	Candidate (2005)	Endangered	Possibly extirpated
Northern goshawk (<i>Accipiter gentilis</i>)	Species of Concern	Candidate	
Long-eared myotis (<i>Myotis evotis</i>)	Species of Concern		
Long-legged myotis (<i>Myotis volans</i>)	Species of Concern		
Olive-sided flycatcher (<i>Contopus cooperi</i>)	Species of Concern		
Cascade frog (<i>Rana cascadae</i>)	Species of Concern		
Makah's copper butterfly (<i>Lycaena mariposa charlottensis</i>)	Species of Concern	Candidate	
Northern sea otter (<i>Enhydra lutris kenyoni</i>)	Species of Concern	Endangered	
Olympic torrent salamander (<i>Rhyacotriton olympicus</i>)	Species of Concern		Endemic
Pacific Townsend big-eared bat (<i>Corynorhinus townsendii townsendii</i>)	Species of Concern	Candidate	
Peregrine falcon (<i>Falco peregrinus</i>)	Species of Concern	Sensitive	
Tailed frog (<i>Ascaphus trueii</i>)	Species of Concern		
Van Dyke's salamander (<i>Plethodon vandykei</i>)	Species of Concern	Candidate	
Western toad (<i>Bufo borealis</i>)	Species of Concern	Candidate	
Common loon (<i>Gavia immer</i>)		Concern	
Brandt's cormorant (<i>Phalacrocorax penicillatus</i>)		Candidate	

Appendix G: State and Federal Listed Species In Olympic National Park

SPECIES	FEDERAL STATUS	STATE STATUS	Notes
Common murre (<i>Uria aalge</i>)		Candidate	
Golden eagle (<i>Aquila chrysaetos</i>)		Candidate	
Keen's myotis (<i>Myotis keenii</i>)		Candidate	
Merlin (<i>Falco columbarius</i>)		Candidate	
Pileated woodpecker (<i>Dryocopus pileatus</i>)		Candidate	
Purple martin (<i>Progne subis</i>)		Candidate	
Vaux's swift (<i>Chaetura vauxi</i>)		Candidate	
Western grebe (<i>Aechmophorus occidentalis</i>)		Candidate	

FISH SPECIES OF CONCERN

SPECIES	FEDERAL STATUS	STATE STATUS	Notes
Bull trout (<i>Salvelinus confluentus</i>)	Threatened		Critical Habitat; EFH*
Puget Sound chinook (<i>Oncorhynchus tshawytscha</i>)	Threatened		EFH
Hood Canal chum (<i>Oncorhynchus keta</i>)	Threatened		EFH
Ozette Lake sockeye (<i>Oncorhynchus nerka</i>)	Threatened		Critical Habitat; EFH
Puget Sound/Strait of Georgia coho (<i>Oncorhynchus kisutch</i>)	Species of Concern	Candidate	EFH
Puget Sound Steelhead (<i>Oncorhynchus mykiss</i>)	Threatened		Effective June 11, 2007
River lamprey (<i>Lampertra ayresi</i>)	Species of Concern		
Olympic mudminnow (<i>Novumbra hubbsi</i>)			
Pygmy whitefish (<i>Prosopium coulteri</i>)			
Eulachon (<i>Thaleichthys pacificus</i>)			
Rockfish (marine species)			
Pacific herring (<i>Clupea pallasii</i>)			Marine waters
Pacific lamprey (<i>Lampertra tridentata</i>)	Species of Concern		

* EFH is essential fish habitat

OTHER SENSITIVE/LISTED SPECIES THAT OCCUR NEAR OLYMPIC NATIONAL PARK

SPECIES	FEDERAL STATUS	STATE STATUS	NOTES
Western snowy plover (<i>Charadrius alexandrinus nivosus</i>)	Threatened	Endangered	
Cassin's auklet (<i>Ptychoramphus aleuticus</i>)	Species of Concern	Candidate	

APPENDIXES

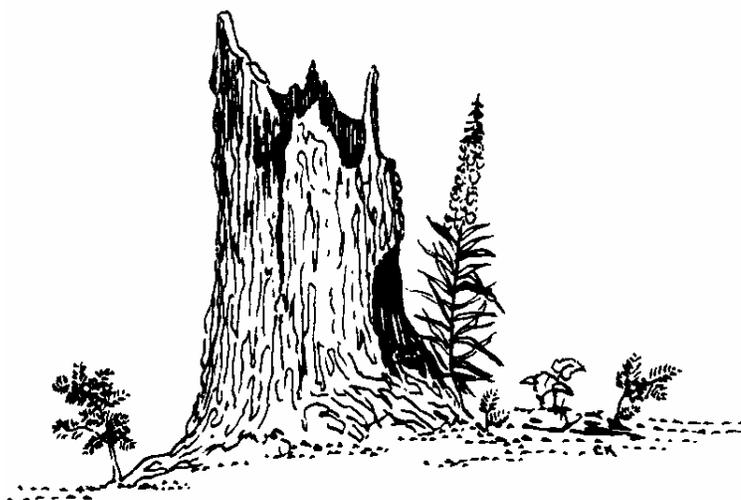
SPECIES	FEDERAL STATUS	STATE STATUS	NOTES
Tufted puffin (<i>Fratercula cirrhata</i>)	Species of Concern	Candidate	
Brandt's cormorant (<i>Picoides articus</i>)		Candidate	

State and Federal listed vascular plants in Olympic National Park

SPECIES	FEDERAL STATUS	STATE STATUS	NOTES
<i>Abronia umbellata</i> ssp. <i>breviflora</i>	Species of Concern	Endangered	Probably extirpated
<i>Arabis furcata</i> var. <i>olympica</i>		Review Group 2	
<i>Astragalus cottonii</i>	Species of Concern	Threatened	
<i>Boschniakia hookeri</i>		Review Group 1	
<i>Botrychium ascendens</i>	Species of Concern	Sensitive	
<i>Carex anthoxanthea</i>		Sensitive	
<i>Carex circinata</i>		Sensitive	
<i>Carex obtusata</i>		Sensitive	
<i>Carex pluriflora</i>		Sensitive	
<i>Carex scirpoidea</i> var. <i>scirpoidea</i>		Sensitive	
<i>Carex stylosa</i>		Sensitive	
<i>Cimicifuga elata</i>	Species of Concern	Sensitive	
<i>Claytonia lanceolata</i> var. <i>pacifica</i>		Threatened	
<i>Cochlearia officinalis</i>		Sensitive	
<i>Coptis aspleniifolia</i>		Sensitive	
<i>Coptis trifolia</i>		Threatened	
<i>Draba lonchocarpa</i> var. <i>vestita</i>		Review Group 1	
<i>Dryas drummondii</i>		Sensitive	
<i>Erigeron aliceeae</i>		Sensitive	
<i>Erythronium quinaultense</i>		Threatened	
<i>Gentiana douglasiana</i>		Sensitive	
<i>Hedysarum occidentale</i>		Sensitive	
<i>Hierochole odorata</i>		Review Group 1	
<i>Lobelia dortmanna</i>		Threatened	
<i>Lycopodiella inundata</i>		Sensitive	
<i>Microseris borealis</i>		Sensitive	
<i>Montia diffusa</i>		Sensitive	
<i>Oxytropis borealis</i> var. <i>viscida</i>		Sensitive	
<i>Parnassia palustris</i> var. <i>tenuis</i>		Sensitive	
<i>Pellaea breweri</i>		Sensitive	
<i>Pinus albicaulis</i>	Species of Concern		
<i>Plantago macrocarpa</i>		Sensitive	
<i>Poa laxiflora</i>		Sensitive	

Appendix G: State and Federal Listed Species In Olympic National Park

SPECIES	FEDERAL STATUS	STATE STATUS	NOTES
<i>Poa nervosa</i>		Sensitive	
<i>Polemonium carneum</i>		Threatened	
<i>Sanguisorba menziesii</i>		Threatened	
<i>Saxifraga rivularis</i>		Sensitive	
<i>Saxifraga tischii</i>		Review Group 1	
<i>Sparganium fluctuans</i>		Threatened	
<i>Synthyris pinnatifida</i> var. <i>lanuginosa</i>		Threatened	
<i>Utricularia intermedia</i>		Sensitive	
<i>Utricularia minor</i>		Review Group 1	
<i>Whipplea modesta</i>		Review Group 1	



GLOSSARY

Adaptive Use - A use for a structure or landscape other than its historic use, normally entailing some modification of the structure or landscape.

Advisory Council on Historic Preservation — The Advisory Council on Historic Preservation (ACHP) is an independent federal agency that promotes the preservation, enhancement, and productive use of our nation's historic resources and advises the president and Congress on national historic preservation policy. As directed by National Historic Preservation Act of 1969 as amended, the council serves as the primary federal policy advisor to the president and Congress; recommends administrative and legislative improvements for protecting our nation's heritage; advocates full consideration of historic values in federal decision-making; and reviews federal programs and policies to promote effectiveness, coordination, and consistency with national preservation policies.

Archeological Resource — Any material remains or physical evidence of past human life or activities which are of archeological interest, including the record of the effects of human activities on the environment. They are capable of revealing scientific or humanistic information through archeological research (NPS DO-28).

Backcountry — Areas of the park that are not developed, including wilderness zones and river zone.

Cultural Landscape — A geographical area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values (NPS DO-28). Four general kinds of cultural landscape, not mutually exclusive, are recognized. These are

- Historic site is a landscape significant for its association with a historic event, activity, or person.
- Historic designed landscape, which is a landscape significant as a design or work, is consciously designed and laid out either by a master gardener, landscape architect, architect, or horticulturist to a design principle, or by an owner or other amateur according to a recognized style or tradition. It has a historical

association with a significant person, trend or movement in landscape gardening or architecture, or a significant relationship to the theory or practice of landscape architecture.

- Historic vernacular landscape whose use, construction, or physical layout reflects endemic traditions, customs, beliefs, or values in which the expression of cultural values, social behavior, and individual actions over time is manifested in physical features and materials and their interrelationships, including patterns of spatial organization, land use, circulation, vegetation, structures, and objects; in which the physical, biological, and cultural features reflect the customs and everyday lives of people.
- Ethnographic landscape is an area containing a variety of natural and cultural resources that associated people define as heritage resources, including plant and animal communities, geographic features, and structures, each with their own special local names.

Cultural Resource — An aspect of a cultural system that is valued by or significantly representative of a culture or that contains significant information about a culture. A cultural resource may be a tangible entity or a cultural practice. Tangible cultural resources are categorized as districts, sites, buildings, structures, and objects for the National Register of Historic Places and as archeological resources, cultural landscapes, structures, museum objects, and ethnographic resources for NPS management purposes.

Estuarine — Estuarine refers to something related to or in an estuary.

Ethnographic landscape - Areas containing a variety of natural and cultural resources that associated people define as heritage resources, including plant and animal communities, geographic features, and structures, each with their own special local names.

Ethnographic Resource — A site, structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it. Ethnographic resources eligible for listing in the national register

are known as traditional cultural properties (NPS DO-28).

Frontcountry — Non-wilderness areas of the park where park facilities and concession facilities may be located.

Historic District — A geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, landscapes, structures, or objects, united by past events or aesthetically by plan or physical developments. A district may also be composed of individual elements separated geographically but linked by association or history (NPS DO-28).

List of Classified Structures (LCS) — The List of Classified Structures is the primary computerized database containing information about historic and prehistoric structures in which the National Park Service has or plans to acquire legal interest. Properties included in the list are either in or eligible for listing in the national register or are to be treated as cultural resources by law, policy, or a decision reached through the planning process even though they do not meet all national register requirements (NPS DO-28).

Minimum Requirement — The minimum requirement concept is a documented process used to determine whether administrative activities affecting wilderness resources or visitor experience are necessary, identify the minimum tool needed to effectively accomplish the task, and how to minimize impacts from such activities.

Museum Collection — Assemblage of objects, works of art, historic documents, and/or natural history specimens collected according to a rational scheme and maintained so they can be preserved, studied, and interpreted for public benefit. Museum collections normally are kept in park museums, although they may also be maintained in archeological and historic preservation centers (NPS DO-28).

Museum Object — A material thing possessing functional, aesthetic, cultural, symbolic, and/or scientific value, usually movable by nature or design. Museum objects include prehistoric and historic objects, artifacts, works of art, archival material, and natural history specimens that are part of a museum collection (NPS DO-28).

National Register of Historic Places — The comprehensive federal listing of nationally, regionally, or locally significant districts, sites, buildings, structures, and objects of national, regional, state, and local significance in American history, architecture, archeology, engineering, and culture kept by the National Park Service under authority of the National Historic Preservation Act of 1966.

Palustrine — Palustrine refers to something related to or in a marshy environment.

Potential Wilderness Area — Lands that are surrounded by or adjacent to lands proposed for wilderness designation but that do not themselves qualify for immediate designation due to temporary nonconforming or incompatible conditions.

Preservation — The act or process of applying measures to sustain the existing form, integrity, and material of a historic structure, landscape, or object. Work might include preliminary measures to protect and stabilize the property, but generally focuses on the ongoing preservation, maintenance, and repair of historic materials and features rather than extensive replacement and new work (NPS DO-28).

Preservation Maintenance — Action to mitigate wear and deterioration of a historic property without altering its historic character by protecting its condition, repairing when its condition warrants with the least degree of intervention including limited replacement in-kind, replacing an entire feature in-kind when the level of deterioration or damage of materials precludes repair, and stabilization to protect damaged materials or features from additional damage (NPS DO-28).

Rehabilitation — The act or process of making possible an efficient compatible use for a historic structure or landscape through repair, alterations, and additions while preserving those portions or features that convey its historical, cultural, and architectural values (NPS DO-28).

Restoration — (1) The act or process of accurately depicting the form, features, and character of a historic structure, landscape, or object as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period; (2) The resulting structure, landscape, or object (NPS DO-28).

Stabilization *See preservation maintenance.*

Section 106 — Refers to Section 106 of the National Historic Preservation Act of 1966, which requires federal agencies to take into account the effects of their proposed undertakings on properties included or eligible for inclusion in the National Register of Historic Places and give the Advisory Council on Historic Preservation a reasonable opportunity to comment on the proposed undertakings (NPS DO-28).

State Historic Preservation Officer (SHPO) — An official in each state appointed by the governor to administer the state historic preservation program and carry out certain responsibilities relating to federal undertakings in the state (NPS DO-28).

Structure — Structures are constructed works, usually immovable by nature or design, consciously created to serve some human activity. Examples are buildings of various kinds, monuments, dams, roads, railroad tracks, canals, millraces, bridges, tunnels, locomotives, nautical vessels, stockades, forts and associated earthworks, Indian mounds, ruins, fences, and outdoor sculpture. In the national register program “structure” is limited to functional constructions other than buildings (NPS DO-28).

Traditional Cultural Properties — A property associated with cultural practices or beliefs of a living community that are rooted in that community’s history or are important in maintaining its cultural identity. Traditional cultural properties are ethnographic resources eligible for listing in the national register (NPS DO-28).

Wilderness — The congressionally designated Olympic Wilderness.

Wilderness Character — Includes the physical attributes of a land unmanipulated by humans, and also many intangible values like outstanding opportunities for solitude, or primitive and unconfined recreation and all of its components.

Wilderness Eligibility Study — All NPS-administered lands, including new units or additions to existing units since 1964, will be evaluated for their eligibility for inclusion in the national wilderness preservation system. Additionally, lands that were originally assessed as ineligible for wilderness because of nonconforming or incompatible uses must be reevaluated if the nonconforming uses have been terminated or

removed. A wilderness eligibility assessment will consist of a memorandum from the regional director to the NPS director that makes a managerial determination as to the eligibility of the park lands for wilderness designation.

NPS lands will be considered eligible for wilderness if they are at least 5,000 acres or of sufficient size to make practicable their preservation and use in an unimpaired condition, and if they possess the following characteristics (as identified in the Wilderness Act):

- the earth and its community of life are untrammelled by humans, where humans are visitors and do not remain;
- the area is undeveloped and retains its primeval character and influence without permanent improvements or human habitation;
- the area generally appears to have been affected primarily by the forces of nature, with the imprint of humans’ work substantially unnoticeable;
- the area is protected and managed so as to preserve its natural conditions;
- the area offers outstanding opportunities for solitude or a primitive and unconfined type of recreation; and
- may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

Lands that have been logged, farmed, grazed, mined, or otherwise used in ways not involving extensive development or alteration of the landscape may also be considered eligible for wilderness designation if, at the time of assessment, the effects of these activities are substantially unnoticeable or their wilderness character could be maintained or restored through appropriate management actions.

The established use of motorboats, snowmobiles, or aircraft does not make an area ineligible for wilderness. The nature and extent of any impacts on the environment and on eligibility, and the extent to which the impacts can be mitigated would need to be addressed in subsequent wilderness studies, along with the possible need to discontinue the use.

Wilderness Values — These are the intrinsic values of wilderness, which can be defined as the important benefits of wilderness. The Wilderness Act includes the following values of wilderness: experiential (recreation, opportunities for solitude),

ecological, geological, scientific, educational, scenic and aesthetic, and historic and cultural values. However, others may include spiritual, economic, and symbolic values as important wilderness values.



GLOSSARY OF TERMS FOR MAINTAINED TRAILS

The trail classification system for Olympic National Park is based on the intended purpose of the trail, type and volume of use, terrain, and whether or not it is maintained. The two major categories of routes are maintained trails and non-maintained designated paths and routes. Maintained trails include six classes: 1) Nature, 2) All Purpose, 3) Multipurpose Bicycle, 4) Secondary, 5) Foot, 6) Primitive. Some trails would be handicap accessible.

Officially recognized paths or routes that generally receive no maintenance include: 1) Way Trails, 2) Social Trails, 3) Winter Trails (unplowed roads), 4) Routes, 5) Beach Routes. Definitions for the eleven use classes of trails, paths and routes are as follows:

Maintained Trails:

Nature Trails — These trails are generally paved (outside of wilderness) or gravel surfaced and are designed for large numbers of relatively inexperienced users. Stock are prohibited except for occasional administrative use, or when a nature trail is the only trail available for stock to access all-purpose or secondary trails. They are maintained to a standard for higher use volumes.

All Purpose Trails — These trails are main routes; they are open to hikers and stock, and are maintained to a standard for stock travel.

Multipurpose Bicycle Trails — Located outside of wilderness, these trails are open to hikers, stock, and bicycles and are maintained to all-purpose standards.

Secondary Trails — These trails are open to hikers and stock and would be maintained to a standard for foot travel. These trails are designed for experienced horses and riders.

Foot Trails — These trails are open to hikers and are maintained to a standard for foot travel. They are closed to stock, except for occasional administrative use.

Primitive Trails — These trails are open to hikers only, for high elevation or low-use area access. Primitive trails include both constructed trails and

trails established by continual use. These trails have minimal improvements — enough to protect the resources. Occasional maintenance is performed, as time and budget allow, to keep routes open and protect the resources.

Universally Accessible Trail — A term used to describe a trail that is accessible to and usable by people with disabilities.

Designated Paths and Routes (generally not maintained):

Way Trails — These officially recognized paths, generally established by previous use, are open to hikers. In sections with no established paths, routes may be marked for resource protection. Maintenance is performed for resource protection only.

Social Trails — These paths, generally found in campsite or day use areas, provide access to water, toilets, campsites, views, or the main trail. They are of minimum size. Maintenance is performed for resource protection only.

Winter Trails — This trail class is a seasonal designation for roads that are covered in snow in winter, usually at high elevations. They are closed to vehicular traffic and open to snowshoe and ski travel in winter.

Routes — Routes include cross-country and mountain climbing routes. They are not marked, and the goal is for there to be no sign of resource impact.

Beach Travelways — A term used to describe beaches designated as travel routes open to hikers. Trail standards do not apply.



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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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