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August 7, 2006

Mr. Bill Laitner
Superintendent
Olympic National Park
NPS Denver Service Center – Planning
P.O. Box 25287
Denver, CO 80225

Dear Mr. Laitner:

I recently received a copy of the Draft General Management Plan (DGMP) for the Olympic National Park (ONP). I am writing to give you my comments on the Draft GMP.

Merrill & Ring is the predecessor owner and current manager for timberlands owned by former partners R.D. Merrill Company, Ring Family Limited Partnership, and JLCG LLC. In total the companies own about 60,000 acres of forest land in Washington, most of it on the Olympic Peninsula. Nearly 8000 acres are located within the proposed Lake Ozette park boundary expansion. An additional 800 acres are within the proposed Lake Crescent park boundary expansion.

We oppose the proposed expansions of the ONP boundary in the Lake Ozette and Lake Crescent areas as shown in the DGMP. Our lands within the proposed expansion and elsewhere are actively managed for timber production. While the lands are productively growing forests they cannot be considered wilderness, pristine, or of any exceptional quality for which National Park status is appropriate. As forest landowners for over 120 years we hope to accumulate additional lands and grow the industry, not diminish it through large sales of productive assets. The proposed expansions and purchase of nearly 60,000 acres of private forest land will adversely affect timber supplies to area mills, threatening their continued viability. The DGMP completely fails to address these impacts. Acquisition costs are grossly underestimated, and will likely be at least 5 times the draft cost. While acquisitions may only occur between willing buyers and sellers, boundary expansions will impose further forest practice regulations on the inholder private and state lands within the new boundaries. The DGMP fails to consider or acknowledge the recent changes to the Forest Practices Act and accompanying Habitat Conservation Plan which affect all private timberlands. These rule changes are designed to protect water quality and fish habitat to comply with federal Endangered Species Act and Clean Water Act requirements. Finally, the ONP cannot currently meet its maintenance obligations and has a backlog reported to be about \$43 million (over 10 times annual maintenance appropriations), so it seems illogical to expand the park boundaries to this degree.

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?

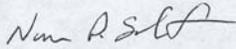
Conclusion

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