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August 3, 2006

Olympic National Park Draft General Management Plan  
National Park Service  
Denver Service Center  
P.O. Box 25287  
Denver, Colorado 80225

Ladies and Gentlemen:

Thank you for the opportunity to review the Olympic National Park General Management Plan.

In general the preferred General Management Plan alternative (D) is timid, overly focused on motorized use and development, and inadequate to preserve the ecological integrity of Olympic National Park. The preferred alternative short changes ecosystem restoration and compromises wilderness character. The format is preoccupied with meeting the requirements of the Environmental Policy Act rather than bold visionary planning. Olympic National Park planners can and should do better.

Olympic National Park in 2006 offers the following opportunities:

- Park boundaries could be expanded in five critical areas (Lake Crescent and Ozette Lake, and Hoh, Queets, and Quinault watersheds) to conform with watershed basins to help recovering salmon populations and protect critical elk habitat.
- Intertidal preserves could be established on the park's wilderness coast to protect biologically rich marine areas.
- River designations could insure that natural functions of coastal rivers and a wealth of wild salmon populations remain intact.
- Extirpated species like the wolf and fisher could be reintroduced to the park to complete a nearly intact ecosystem.

All of these measures are discussed in the park's 400-page document. Sadly, only two (intertidal reserves and modest boundary expansions in three areas) are included in the park's preferred alternative (Alternative D).

Proposals in the preferred alternative that I do support are:

- Establishes marine intertidal reserves along sensitive areas of the coast
- Recommends expanding the park's boundaries in the Ozette basin (12,000 acres), Lake Crescent area (1,640 acres), and the Queets River corridor (2,300 acres)
- Recommends a wilderness suitability study for Lake Ozette.
- Recommends Wild and Scenic River designation for the Elwha River.
- Expands educational and interpretive programs.
- Encourages mass transit in heavily used developed areas, and
- Proposes development of short all-accessible loop trails throughout the park's front country.

Unfortunately few of them are developed in sufficient detail to insure long-term ecosystem protection.

In contrast, several other recommendations in the preferred alternative (D) threaten the park's ecological integrity by placing developed recreation and motorized access over natural resource protection and species restoration.

On the negative side, the preferred alternative:

- 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.
- Maintains all road access in the park, including floodplains, regardless of impacts on salmon habitat and natural river process. Continues bulldozing Finley Creek channel in the Quinault area. And recommends moving wilderness boundaries on active floodplains to maintain problem roads.
- Proposed boundary expansions do not conform to watershed boundaries and are inadequate to protect downstream fish species from destructive upstream activities like timber harvest and road building.

- Greatly expands development zones from their current size. The Sol Duc campground, for instance, can be expanded from 82 campsites to 250.
- Allows expansion of commercial concessions within the park.

In addition, several measures requested at the beginning of the planning process have not been included:

- No ecosystem study was undertaken to provide necessary groundwork for long-term decision making.
- No decision to reintroduce extirpated wolves to the Olympics despite a favorable government study of the issue, or to remove non-native wildlife.
- No Wild and Scenic River eligibility study for 12 rivers that qualify for designation.
- An overemphasis on historic preservation at the expense of natural resource and wilderness protection.
- No wilderness management plan was completed (18 years after designation of the Olympic Wilderness) yet numerous controversial decisions about wilderness -- such as maintaining and restoring between 29 and 50 historic structures in designated wilderness -- are included.

In summary, I believe you should:

- \* Olympic National Park's highest priorities should be preserving its natural systems, restoring threatened wildlife, and protecting the integrity of its world-class wilderness.
- \* The park service should move quickly on establishing intertidal reserves on the Olympic Coast and recommending wilderness study for Ozette Lake.
- \* Expand park boundaries 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 critical salmon habitats and natural river processes are preserved as proposed in alternative B, and to recommend all 13 eligible rivers for federal Wild and Scenic river designation.

\* Restore extirpated species like the wolf and fisher.

\* Developed areas should be kept at their current size as described in alternative A. New recreational developments are best located outside the national park.

- All decisions relating to wilderness be deferred until a comprehensive wilderness management plan is completed and available for public review.

Please include these comments in the record and notify me of the action taken.

Sincerely,

A black rectangular redaction box covers the signature and name of the sender.