PEPC 190942

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National Park Service
Carla McConnell
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Re: Olympic National Park GMP

September 28th, 2006

Ladies and Gentlemen:

Those involved in this written draft should be embarrassed at the quality of the final draft plan after the time it took to gather and write it. It is difficult to determine any benefit to our region. It will certainly bring loss of family wage jobs and loss of revenue to our County and trample private property rights.

Your statement that "the General Management Plan represents a commitment by the National Park Service to the public on how the national park will be managed" (pg. 5 is not clear! It creates many more questions than it answers! The draft management plan is full of inaccurate, outdated and misleading data.

- National park managers have their clear framework for park management but it is not at all clear to the average citizen. Over the past 30 years the overall use of ONP has diminished. Your own congressional representatives have stated that the National Park Service is not meeting its' primary mission. (U.S. House of Rep, Committee on Resources, 2-23-06). Rep. Stevan3. Pearce(R-NM.) says "I am very concerned that he final draft, while making some notable improvements, appears to retreat back to the 2001 management policies, which failed to provide an effective balance between enhancing visitor enjoyment and conservation." (US House of Rep., Committee on Resources, 7-25-06.) After reading the ONP draft management plan, I have the same comments as stated by the Resource Committee.
- This draft document, past and recent actions of members of the Park Service prove that you do not consult with interested stakeholders and once again analysis of the benefits, impacts and economic costs of alternative courses of action are outdated, vague or just plain missing.
- It will serve as YOUR basis as strategic plans and implementation but how does anyone else understand what it will mean to their job, quality of life or park experience?

The long list of selected references (Pgs 393-398) does not 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. These are all missed opportunities!

Any loss of private timberland by Park boundary adjustments will have an adverse economic impact on the entire region and limit future growth opportunities. It is a question of jobs that pay family wages with benefits vs. low paying service jobs. I recommend that the Olympic National Park take better care of their current assets without adding the additional burden of acquisition and maintenance expense. The House Resources Subcommittee on National Parks questions the ability of the NPS to "provide an effective balance between enhancing visitor enjoyment and conservation". Private timberland owners have focused forest practices rules on water quality, fish and wildlife habitat in order to meet the federal regulations on Endangered Species, Clean Water and Clean Air. The draft contains comments about timber harvest sedimentation and stream erosion especially in the Ozette that does not recognize the enormous efforts of industrial landowners to manage with an emphasis on conservation. (Forest & Fish Rules and Lake Ozette Sockeye Recovery Plan) Your comments are outdated and are not supported with data.

As a taxpayer, I was angered by statements on page 35 relative to ONP land exchanges with the Washington Department of Natural Resources stating how these lands might be managed. Unlike the Park, the DNR has a constitutional fiduciary responsibility to produce income for trust beneficiaries. The comments as to how the DNR land should be managed should not have been mentioned in your draft. It is none of your business!

Your comments on the "ONP protection of the largest population of Roosevelt Elk in its natural environment in the world" (pg.10) made me chuckle. The population of elk, deer and bear will benefit from active forest management vs. the Parks' preservationist goals. Timber harvest creates openings that supply the forage needs while the absence of timber harvest in ONP and on USFS lands have forced the animals into residential areas and farmlands. In the Forks area, there are about 10 herds that frequently graze on private farmland alongside domestic animals. As the public forestlands become more dense, elk & deer are denied the openings they need to forage. They cannot thrive without the additional support of managed forests.

A huge tourist attraction used to be the mountain goats that are referenced as non-native (pg 111) but they were here before the establishment of ONP. Their populations should have been managed so they could have remained as an attraction especially in the Mt. Angeles area. It is a shame they were destroyed!

As a rural landowner, I have concerns about the NPS fire policy called "minimum requirement techniques" (pg17). Several years ago, a lightning strike in September started a small one acre fire in a remote slope north and west of Hurricane Ridge. A recent picture (enclosed) shows some of the fire damage. My concern is that when this fire began, our area was nearing the end of a dry summer. The fire as shown in the picture was not far from the City of Port Angeles. The Park enacted their minimum

requirement techniques and let the fire burn until it eventually grew to nearly a thousand acres. Letting the fire burn did not seem like a prudent action given the dry conditions, high fire danger and the proximity to our city. As the fire grew the efforts grew to fight the fire but it could have been a disaster. Luckily, Mother Nature sent a cool, soaking rain and helped douse the fires spread. It was more LUCK than SKILL that kept this fire from becoming a major disaster. The fire policy should be flexible based on each fire. I would prefer not to lose our National Park and surrounding private property to inflexible fire management policies.

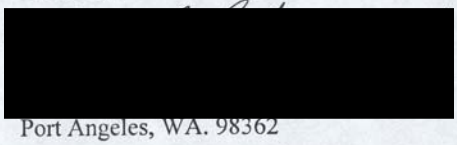
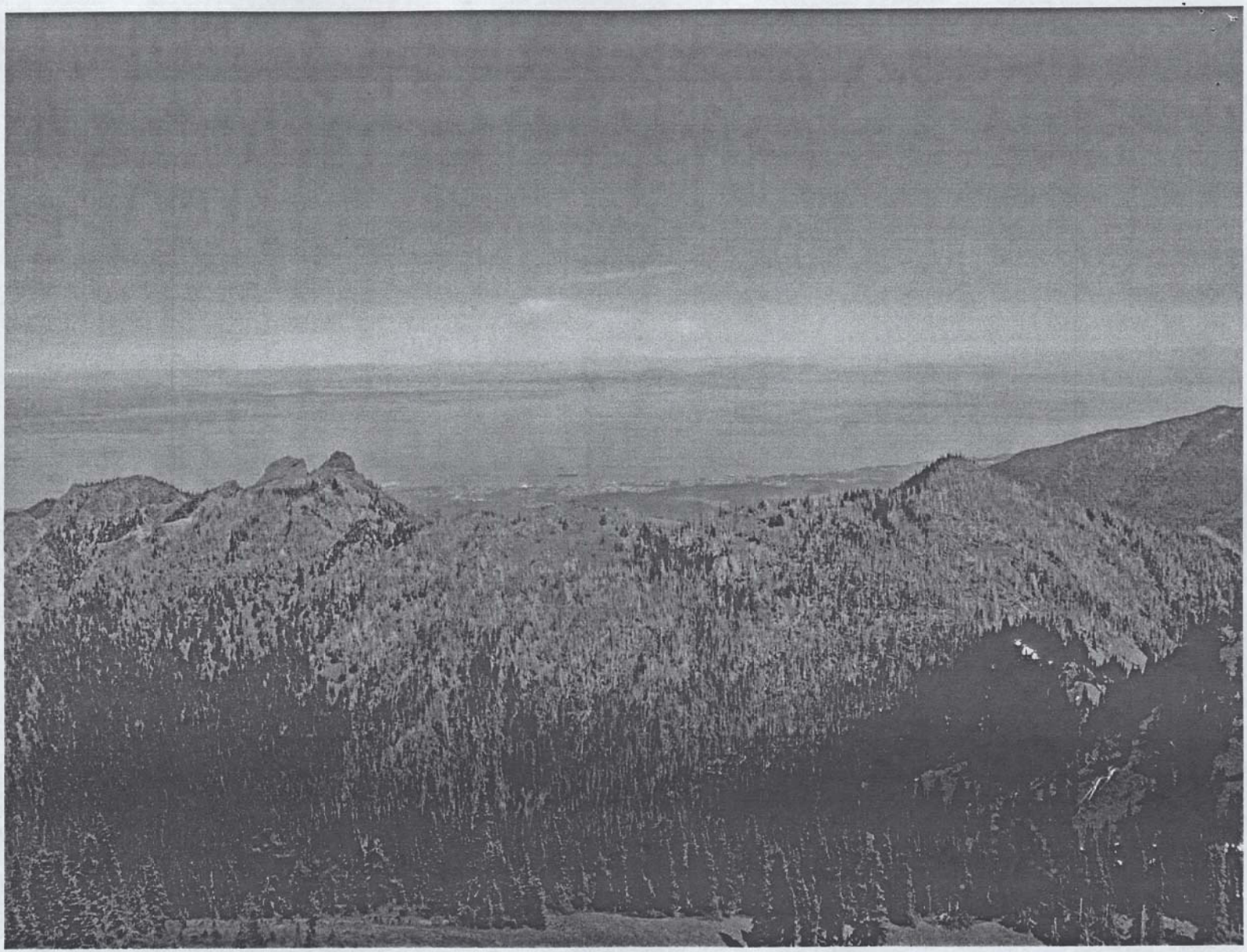
Tourism is a valuable asset to the economy of the Olympic Peninsula and we benefit from the visitors that come to see the ONP. It is however, a seasonal business and our economy depend on jobs created by natural resources and public jobs. Over the past several decades declining Park budgets have diminished visitor opportunities in lost programs and visitor services. These are lost opportunities to keep visitors here longer and for return visits. It is difficult to determine the impacts of any increased or decreased Park facilities and services mentioned in the draft. We can only hope that you see the Olympic National Park as an asset that should be managed for the beneficial use of the citizens of the United States.

Page 64 contains a summary of comparative costs in 2005 dollars and estimates land protection/ boundary adjustments for each alternative. I burst another chuckle as I found the estimates of acquisition to be unrealistic and probably only about 10% of the real costs. Do you plan to diminish the value of private property with your boundary expansion so you can buy the property at a huge discount?

The comment of human caused global warming on page 313 did not bring a chuckle and is an irresponsible statement. Who is the responsible author and what is their source of scientific data for making that conclusion?

Many hours have gone into reading this draft plan and writing my comments. After all this, I am not at all clear what a final draft will mean to our region on any of the many issues mentioned. It does not appear that anyone within the process of preparing this document was overly educated on ONP and the surrounding communities. Perhaps this document was meant to lull the public into not feeling threatened by the outcome. Perhaps you should start over!

Sincerely,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