

Comment 543-Port Angeles Business Association

PEPC 191175-543
360 452-0588 P.01

Sep-29-06 01:42P Don Perry Insurance

September 29, 2006

Carla McConnell
Olympic National Park-GMP
National Park Service
PO Box 25287
Denver, CO. 80225

Dear Ms. McConnell:

These comments are in reference to the General Management Plan and are the opinions from the Port Angeles Business Association. This group represents over one hundred of our major businesses in Port Angeles.

In the plan, there are four options that are being suggested. In each of the options there are good points and some that should be looked at further. Taking any one of the options and saying, "This is the one", is probably not the best way to go.

We suggest prioritizing things that have to be done by concentrating on spending. If funds are lacking, which is what we are hearing, priority should be given to the needs to keep the park running efficiently and for the benefit of the park visitors.

One of the problems that we have seen is that most of the Visitor Centers in the park are not in compliance with the Uniform Federal Accessibility Standards first issued in 1984. Priority should be given to making sure that the facilities do comply.

We believe that the budget should then concentrate on enhancing the visitors experience. Many of the attractions that were visitor favorites have been severely cut back or eliminated completely. Some of these are campfire talks by the rangers, walking and informational tours for visitors and evening programs, to name a few.

Campgrounds, buildings and back country amenities have either been eliminated or are in terrible disarray. We believe that this is part of the visitors experience and should be high on the priority list for spending

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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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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
Address 1: 1611 SOUTH GOLF COURSE ROAD
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

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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 FULLINGTON Middle Initial P

Last Name FULLINGTON

Organization PORT ANGELES BUSINESS ASSOCIATION

Address 1: 1611 SOUTH GOLF COURSE ROAD

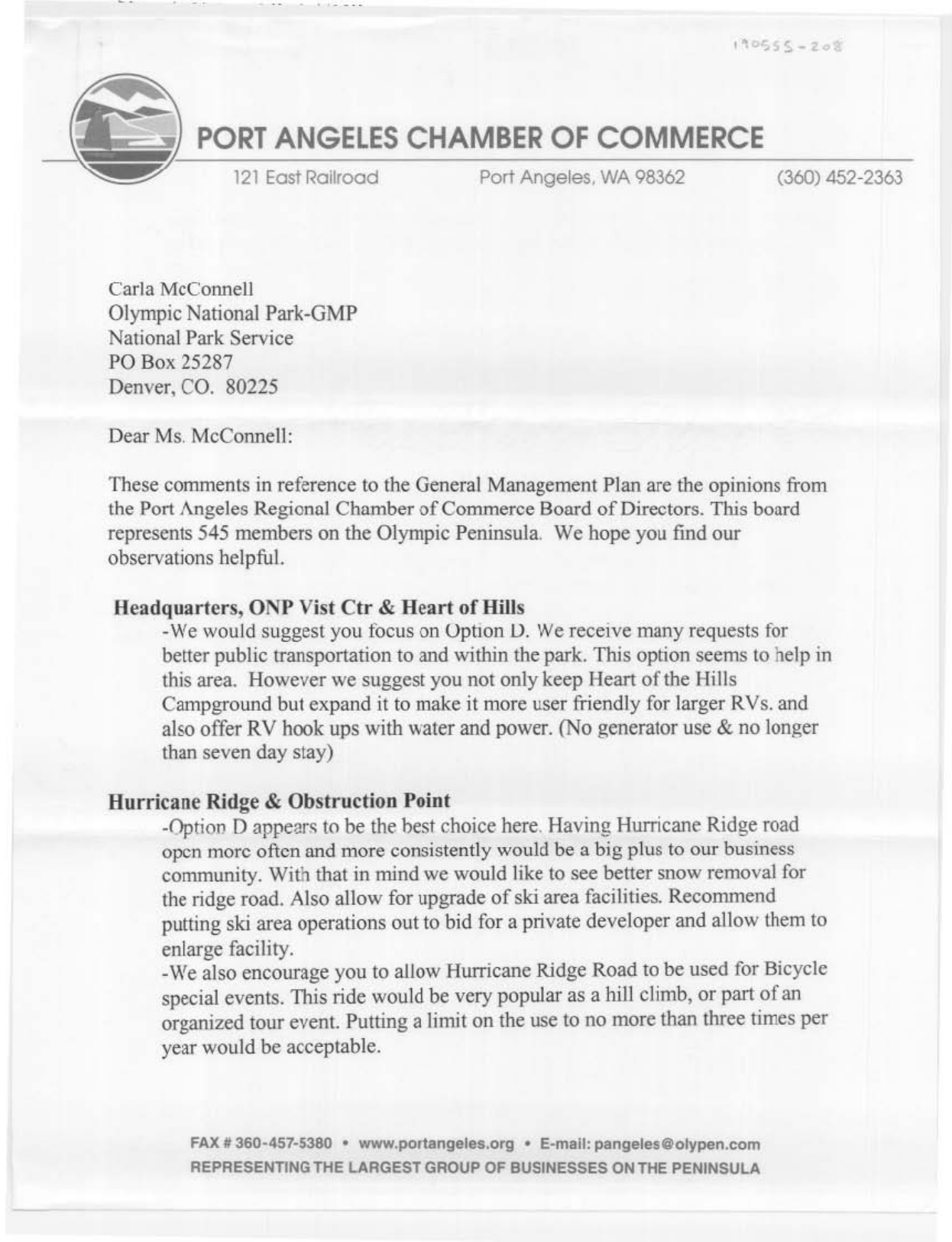
Address 2:

City: PORT ANGELES State/Province WA

Postal Code: 98362-4957

E-mail: earlfullington@mac.com

Comment 208-Port Angeles Regional Chamber of Commerce



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

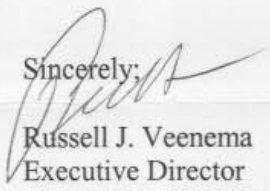
Deer Park

-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



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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
olym_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

Headquarters: 2001 S Street, NW • Suite 570 • Washington, D.C. 20009 • 202-265-PEER (7337) • fax: 202-265-4192
e-mail: info@peer.org • website: <http://www.peer.org>



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 Policies 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.WA. (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.

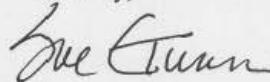
If the NPS believes that the Federal Court wrongly construed the operation of the sometimes-conflicting mandates, then the NPS should have appealed the decision in hopes of reaching a different outcome. But now, the NPS may not use a GMP as a means of writing new case law.

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

September 27, 2006

RECEIVED

OCT - 2 2006

DSC-P

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-Sequim-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
Reautone

TO: ONP	NO. OF PAGES: 3
COMPANY: Carla McConnell	FROM: Laanan
FAX: 360-969-2736	COMPANY: Sequim Chamber
DATE: 9.29.06	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.

SEP-29-2006 12:18P FROM:SEQUIM CHAMBER

360168316349

TO:13039692736

P.2/3

-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

*Celebrating
25 Years*



1978 - 2004

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.
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WA Wilderness Coalition

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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,

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WA Wilderness Coalition

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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

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WA Wilderness Coalition

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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

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WA Wilderness Coalition

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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 protections 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

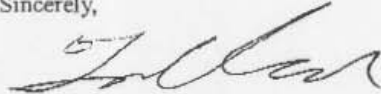
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WA Wilderness Coalition

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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 dark 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;

206 624 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: 406.342.2048 • f: 406.342.7714 • wild@wildernesswatch.org • www.wildernesswatch.org

September 29, 2006

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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.

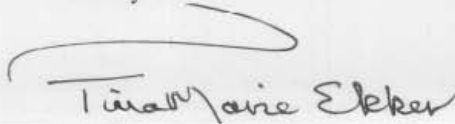
Although it may be true that visitation has substantially increased over the years, it is not desirable for the park to pave over and develop the park's natural landscape to accommodate increased use. Accommodations for increased visitation are most appropriately pursued outside the park. If the park 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

American Rivers Form Letter Sample PEPC 190606-218

 Heather Grubb
heathergrubb@hotmail.com
09/18/2006 12:04 PM
EST
Please respond to
heathergrubb

To: olym_gmp@nps.gov
cc:
Subject: Please conduct Wild and Scenic River eligibility studies for Olympic National Park rivers

Sep 18, 2006

Olympic National Park Draft General Management Plan
P.O. Box 25287
Denver, CO 80225

Dear Draft General Management Plan,

I am writing to urge you to conduct the necessary eligibility studies of all rivers in the Olympic National Park and recommend Olympic's outstanding rivers to Congress for inclusion in the national Wild and Scenic Rivers system, in the current General Management Planning process. This analysis is required under the Wild and Scenic Rivers Act and the National Park Service's management policies.

Rivers such as the Hoh, Quinault, Queets and others deserve the added protection of the Wild and Scenic Rivers Act. These rivers and others in Olympic National Park provide critical habitat for endangered salmon, steelhead and bull trout. Current Park Service practices to maintain year-round road access in flood-prone valleys have damaged important spawning habitat. I disagree with the Park Service's emphasis in the Preferred Alternative on maintaining year-round road access over protection of natural river processes and endangered salmon, steelhead and bull trout.

Finally, I urge you to help recover salmon populations and protect wild rivers by expanding Park boundaries in five key watersheds, as proposed in Alternative B. The Preferred Alternative takes an important step toward this goal, but leaves out important protections for the Hoh and Quinault rivers

Thank you for your consideration of my comments.

Sincerely,

Ms. Heather Grubb
559 Palatine Ave N.
Seattle, WA 98103-3012

Comment 391-Backcountry Horsemen-Petition-79 Signatures



BUCKHORN RANGE CHAPTER
BACKCOUNTRY HORSEMEN OF WASHINGTON
P.O. Box 845, Chimacum, WA 98325

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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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