

National Park Service
U.S. Department of the Interior

Olympic National Park
Washington



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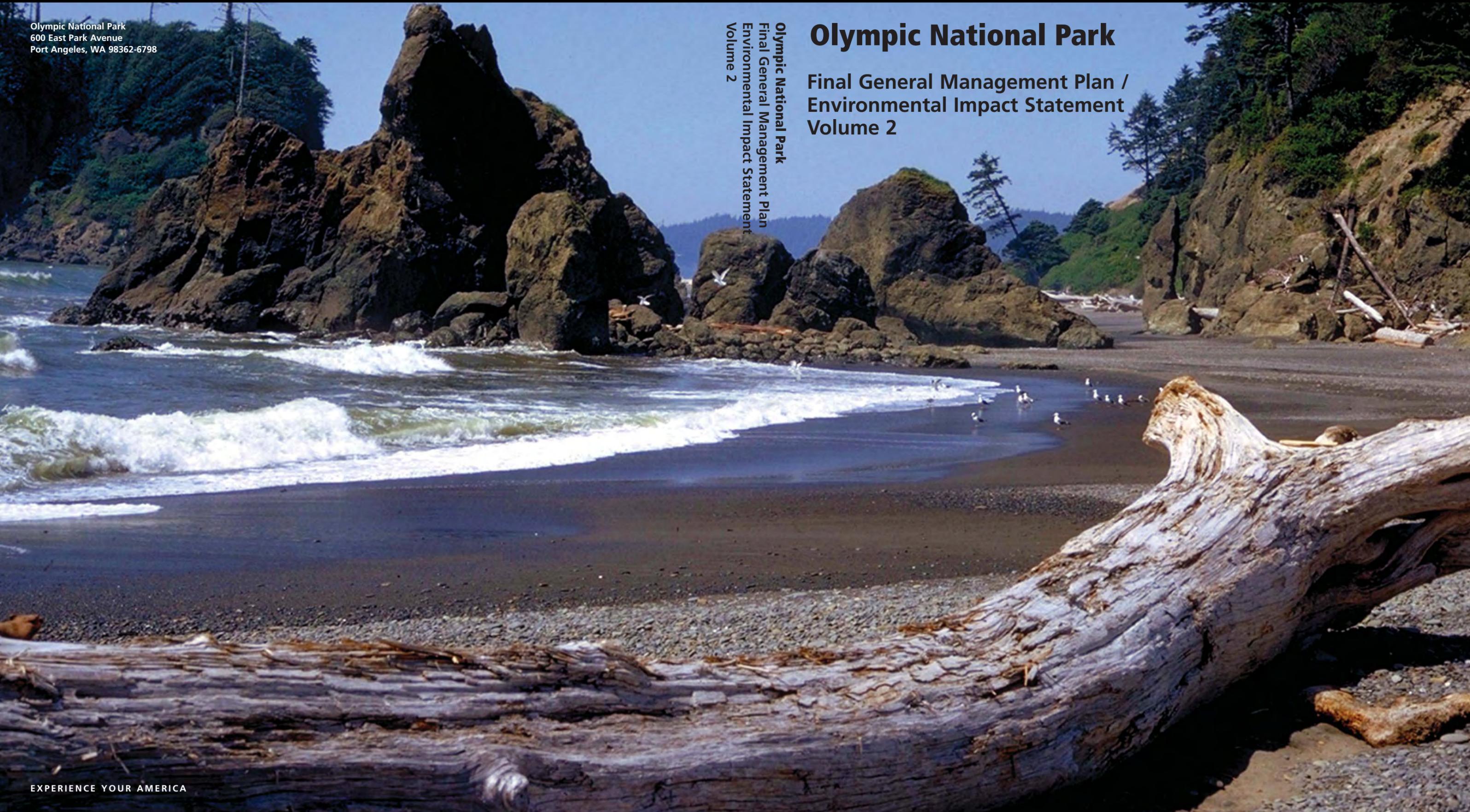


Olympic National Park
600 East Park Avenue
Port Angeles, WA 98362-6798

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

Olympic National Park

Final General Management Plan / Environmental Impact Statement Volume 2



**Final General Management Plan /
Environmental Impact Statement
Volume 2**

**Olympic National Park
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CONTENTS

Chapter 6: Comments and Responses 1

INTRODUCTION	3
RANGE OF COMMENTS	3
CHANGES AND CLARIFICATIONS TO THE DOCUMENT	6
LIST OF COMMENTERS	7
SUBSTANTIVE COMMENTS AND RESPONSES	11
ACCESS	11
Access and Alternative Access Routes	11
Alternative Transportation	11
Closed Roads	12
Coordination with Transportation Agencies	12
Highway 101 Relocation	12
Impacts from Road Maintenance	14
ACCESSIBILITY	14
Lake Ozette and Accessibility Standards	15
AIR QUALITY	15
AIR TOURS AND OVERFLIGHTS	16
BOUNDARY ADJUSTMENTS	16
Appendix B — Analysis of Boundary Adjustments	16
Cost of Boundary Adjustments	16
Impacts to Park Operations from Boundary Adjustments	18
Fisheries and Water Quality Issues Related to Boundary Adjustments	18
Fisheries, Lake Crescent Boundary Adjustment	25
Tribal Consultation — Boundary Adjustments	27
Socioeconomic Environment, Economic Analysis for Boundary Adjustments	27
Socioeconomic Environment, Jobs, Boundary Adjustment	29
Socioeconomic Impact, Taxes, Boundary Adjustment	31
Tribal Concerns, Boundary Adjustment	32
U.S. Forest Service Lands, Boundary Adjustment	33
Vegetation, Boundary Adjustment	33
Viewsheds, Boundary Adjustment	33
Visitor Use and Access, Boundary Adjustment	34
HABITAT PROTECTION	34
Habitat Protection — Cumulative Effects	37
LAWS, REGULATIONS, AND OTHER PLANNING DOCUMENTS	38
Laws, Regulations, and Other Planning Documents — Recognition of Forestland Practices	38
Laws, Regulations, and Other Planning Documents — State Cultural Resource Protection and Management Plan	39
Laws, Regulations, and Other Planning Documents — SEPA and Class IV Regulations	40
Legacy Forest Concept	41
Legislative Requirements	42
ROAD RESTORATION AND RESOURCE PROTECTION	42
Road Restoration Costs	43
BUDGET	44
Park Operations and Maintenance Backlog	44
Park Staffing and Budget	45
CLIMATE CHANGE	45
CONSULTATION AND COORDINATION	46

CONTENTS

Public Workshop Format	46
COSTS	47
CHOOSING BY ADVANTAGES PROCESS	47
CULTURAL RESOURCES	47
Archeological Resources	47
Ethnographic Resources	48
Historic Structures	51
Historic Structures and Cultural Landscapes	52
History of the Olympic Peninsula	53
Museum Management	53
EDUCATION AND OUTREACH	54
Desired Conditions	54
ENVIRONMENTAL CONSEQUENCES	55
ENVIRONMENTALLY PREFERRED ALTERNATIVE	55
FACILITIES	56
FISHERIES	58
Fisheries — Cumulative Effects	59
Fisheries — Exotic Species	60
GENERAL MANAGEMENT PLAN, PURPOSE AND NEED	60
GEOLOGIC PROCESSES	61
Geologic Processes — Cumulative Effects	61
MANAGEMENT ZONING	62
River Zones	63
Intertidal Zones	63
NIGHT SKY	64
OLYMPIC HOT SPRINGS	65
OZETTE LAKE	65
Motorized Use	65
PARTNERSHIPS	67
PRIVATE LANDS	67
RECREATION	68
REFERENCES	68
RIVERS AND FLOODPLAINS	68
Environmental Consequences — Rivers and Floodplains	70
Cumulative Effects, Hydrologic Resources	71
Mitigation, Hydrologic Resources	71
SOCIOECONOMIC RESOURCES	72
Jobs	72
Regional Economy	73
SOUNDSCAPES	74
Desired Conditions — Soundscapes	74
Affected Environment — Soundscapes	75
Environmental Consequences — Soundscapes	76
Environmental Consequences — Cumulative Effects	76
Mitigation — Soundscapes	77
TOPICS DISMISSED	77
Environmental Justice	77
Unique Farmlands	78
ADDITIONAL TRIBAL CONCERNS	78
Consultation	79
Employment	80
Fisheries Resources	81
Partnerships with Area Tribes	83
Project-Specific Questions	85
Treaty Rights and Trust Resources	87

VEGETATION	91
VISITOR USE	91
Access and Stock Use	91
Desired Conditions and Strategies	92
Visitation Figures	93
WATER RESOURCES	94
WILD AND SCENIC RIVERS	95
WILDERNESS	96
Cultural Resources, Cultural Landscapes	96
Cultural Resources, Historic Structures in Wilderness	96
Desired Conditions in Wilderness	100
Environmental Consequences in Wilderness	100
Future Implementation Plans — Wilderness Management Plan	100
Potential Wilderness Areas	101
Eligibility Studies and Wilderness Additions	101
Trails and Wilderness	103
Visitor Use and Wilderness	104
Wilderness Zoning	104
WILDLIFE	105
OTHER COMMENTS AND MODIFICATIONS TO THE GENERAL MANAGEMENT PLAN	107
COMMENT LETTERS	109
CONTENTS FOR COMMENT LETTERS	110
Government Agency Comments	112
Tribal Governments	169
Businesses	227
Interested Parties	267
Petitions and Forms	402
Appendixes, References, Preparers and Consultants, and Index	419
Appendix A: Legislation	421
Appendix B: Analysis of Boundary Adjustment and Land Protection Criteria	431
Appendix C: Washington Islands National Wildlife Refuges	445
Appendix D: Statement of Findings	447
Appendix E: List of Classified Structures for the Park	452
Appendix F: Park Cultural Landscapes Inventory Status	457
Appendix G: State and Federal Listed Species in Olympic National Park	458
Glossary	462
Glossary of Terms for Maintained Trails	466
Selected References	467
Preparers and Consultants	477



Chapter 6:

Comments and
Responses

INTRODUCTION

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

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

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

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

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

RANGE OF COMMENTS

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

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

The following topics received the most comment:

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

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

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

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

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

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

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

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

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

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

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

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

CHANGES AND CLARIFICATIONS TO THE DOCUMENT

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

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

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

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

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

LIST OF COMMENTERS

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

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

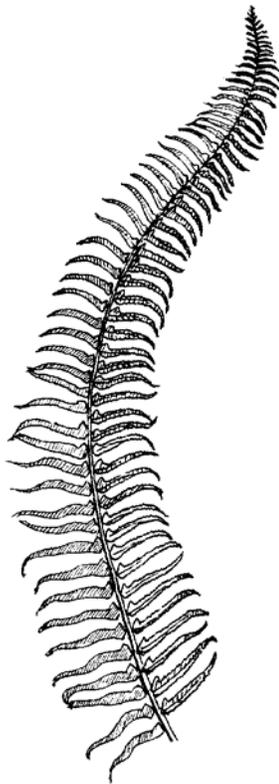
NOTE: Letters are numbered by the National Park Service Planning, Environment, and Public Comment (PEPC) system and are part of a nationwide database; therefore, the numbers are not in chronological order. (The comment letters in this document are also not in this order.)

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

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

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

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



SUBSTANTIVE COMMENTS AND RESPONSES

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

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

ACCESS

Access and Alternative Access Routes

Comments: Please address the following specific issues:

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

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

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

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

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

Alternative Transportation

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

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

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

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

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

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

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

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

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

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

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

Closed Roads

Comments: Reopen closed roads (Dosewallips and Queets)

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

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

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

Coordination with Transportation Agencies

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

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

Highway 101 Relocation

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Impacts from Road Maintenance

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

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

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

ACCESSIBILITY

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Lake Ozette and Accessibility Standards

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

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

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

AIR QUALITY

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

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

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

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

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

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

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

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

AIR TOURS AND OVERFLIGHTS

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

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

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

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

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

BOUNDARY ADJUSTMENTS

Appendix B — Analysis of Boundary Adjustments

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

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

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

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

Cost of Boundary Adjustments

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Impacts to Park Operations from Boundary Adjustments

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

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

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

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

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

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

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

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

Fisheries and Water Quality Issues Related to Boundary Adjustments

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Fisheries, Lake Crescent Boundary Adjustment

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

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

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

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

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

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

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

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

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

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

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

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

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

Tribal Consultation — Boundary Adjustments

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

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

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

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

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

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

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

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

Socioeconomic Environment, Economic Analysis for Boundary Adjustments

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Socioeconomic Environment, Jobs, Boundary Adjustment

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

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

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

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

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

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

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

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

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

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

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

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

Socioeconomic Impact, Taxes, Boundary Adjustment

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

This updated analysis has been incorporated into the final EIS.

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

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

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

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

Tribal Concerns, Boundary Adjustment

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

The plan must address potential impacts to tribal hunting.

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

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

U.S. Forest Service Lands, Boundary Adjustment

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

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

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

Vegetation, Boundary Adjustment

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

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

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

Viewsheds, Boundary Adjustment

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

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

Visitor Use and Access, Boundary Adjustment

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

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

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

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

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

HABITAT PROTECTION

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Habitat Protection — Cumulative Effects

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

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

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

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

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

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

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

LAWS, REGULATIONS, AND OTHER PLANNING DOCUMENTS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

On pages 212, 249, 288, 325 of the *Draft General Management Plan* you state: "Logging activities as well as the development and expansion of communities near the park have also disturbed archeological resources outside the park boundaries." This statement must be removed from your *General Management Plan*. The Department of Interior's *Final Environmental Impact Statement for the Forest Practices Habitat Conservation Plan*, dated January 2006, Chapter 4.13, recognizes the extensive regulatory and voluntary practices private forestland owners operate under in order to protect archeological, historic, and cultural resources. The Washington State Forest Practices Regulatory Program regulates forest practices in the state, including forest practices affecting archeological, 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 archeological sites on managed forestlands.

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

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

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

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

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

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

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

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

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

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

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

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

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

Legacy Forest Concept

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Legislative Requirements

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

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

ROAD RESTORATION AND RESOURCE PROTECTION

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

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

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

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

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

Further, there are currently about 420 miles of road in the Ozette watershed, or 5.5 miles of road per square mile (mi/mi²) (Draft limiting factor analysis 2007). On non-federal lands only, the road density exceeds 6 mi/mi². The last 20 years have seen a rapid 40% increase in road construction in the Ozette Watershed, from 260 miles in 1987 to the current

420 miles. Even within the last 5 years, since implementation of the new forest practice rules, the number of road miles in the Ozette Watershed has continued to grow (Draft limiting factor analysis 2007). Evidence suggests a strongly negative correlation between road densities and fish production (Sharma and Hilborne 2001; Thompson and Lee 2000; Pess et al. 2002), with densities as low as 1.6 mi/ mi² having an identifiable effect on the fisheries resource (Thompson and Lee 2000). Although across the state, the new forest practice rules may result in the removal of "thousands of miles of unnecessary roads," it is not yet clear if there will be a net decrease in the number of miles of roads in the Ozette Watershed as a result of the new rules.

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

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

Road Restoration Costs

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

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

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

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

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

BUDGET

Park Operations and Maintenance Backlog

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

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

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

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

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

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

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

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

Park Staffing and Budget

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

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

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

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

rangers and interpreters should be available to educate the public.

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

CLIMATE CHANGE

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

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

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

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

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

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

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

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

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

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

CONSULTATION AND COORDINATION

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

Response: Chapter 5 includes information on consultation and coordination.

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

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

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

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

Public Workshop Format

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

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

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

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

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

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

COSTS

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

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

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

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

CHOOSING BY ADVANTAGES PROCESS

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

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

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

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

CULTURAL RESOURCES

See also, Wilderness

Archeological Resources

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

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

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

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

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

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

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

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

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

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

Ethnographic Resources

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Historic Structures

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

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

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

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

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

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

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

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

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

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

Historic Structures and Cultural Landscapes

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

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

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

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

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

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

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

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

History of the Olympic Peninsula

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

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

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

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

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

Museum Management

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

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

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

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

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

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

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

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

EDUCATION AND OUTREACH

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

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

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

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

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

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

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

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

Desired Conditions

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

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

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

ENVIRONMENTAL CONSEQUENCES

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

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

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

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

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

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

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

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

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

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

ENVIRONMENTALLY PREFERRED ALTERNATIVE

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

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

actions with its neighbors and the surrounding ecosystem.

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

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

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

FACILITIES

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

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

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

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

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

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

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

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

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

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

Comment: Kalaloch Lodge is a historical landmark.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Comment: Keep Sol Duc Hot Springs open.

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

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

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

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

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

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

Comment: Additional camping is needed at Lake Ozette.

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

FISHERIES

See also Boundary Adjustments

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Fisheries — Cumulative Effects

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

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

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

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

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

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

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

Fisheries — Exotic Species

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

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

GENERAL MANAGEMENT PLAN, PURPOSE AND NEED

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

GEOLOGIC PROCESSES

Geologic Processes — Cumulative Effects

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

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

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

MANAGEMENT ZONING

See also, Wilderness

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Designate natural soundscape management units using watersheds as the boundaries.

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

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

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

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

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

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

River Zones

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

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

Intertidal Zones

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Response: We have clarified this in the final plan.

NIGHT SKY

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

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

OLYMPIC HOT SPRINGS

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

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

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

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

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

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

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

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

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

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

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

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

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

OZETTE LAKE

Motorized Use

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

PARTNERSHIPS

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

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

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

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

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

PRIVATE LANDS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

RECREATION

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

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

including kayaking, will continue to be an approved activity.

REFERENCES

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

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

RIVERS AND FLOODPLAINS

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

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

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

were identified in the *Draft General Management Plan*.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Environmental Consequences — Rivers and Floodplains

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

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

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

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

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

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

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

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

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

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

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

Cumulative Effects, Hydrologic Resources

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

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

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

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

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

Mitigation, Hydrologic Resources

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

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

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

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

SOCIOECONOMIC RESOURCES

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

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

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

Jobs

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

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

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

additional earnings, particularly in Grays Harbor and Mason counties.

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

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

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

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

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

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

Regional Economy

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

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

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

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

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

SOUNDSCAPES

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

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

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

Desired Conditions — Soundscapes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Affected Environment — Soundscapes

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

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

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

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

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

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

Environmental Consequences — Soundscapes

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

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

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

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

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

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

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

Environmental Consequences — Cumulative Effects

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

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

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

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

Mitigation — Soundscapes

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

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

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

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

TOPICS DISMISSED

Environmental Justice

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

The plan dismisses, out of hand, the fact that communities and populations in the western portion of Clallam and Jefferson counties do, in fact, suffer from low income and are below the poverty level in many cases. When the private land is taken from them, the result is severe impact to their health and well-being. However, since the plan fails to admit that, here, is a population dependent on land ownership, the *Draft General Management Plan* is deliberately misleading.

Response: Executive Order 12898, “Environmental Justice in Minority and Low-Income Populations,” directs federal agencies to assess whether their actions have *disproportionately high* and adverse human health or environmental effects on minority and low-income populations. Agencies must specifically analyze and evaluate the impact of proposals on minority and low-income populations and communities, as well as the equity of the distribution of the benefits and risk of the decision in the NEPA document. The National Park Service determined that this does not apply, as noted in the “issues dismissed” section of the *Draft General Management Plan* (see ESM95-3 [USDOJ 1995] and ESM98-2 [USDOJ 1998]).

Environmental Justice was examined and appropriately dismissed as an impact topic for the reasons specified on pages 47-48.

However, through the public comment process, additional information about impacts to the socioeconomic environment has been added to the *Final General Management Plan* in the “Affected Environment” and “Environmental Consequences” sections of the plan.

Comment: The Park Service dismisses environmental justice. There should not be adverse health or environmental effects on a particular minority or low-income group because of agency policy. We ask the Park Service to heed this when the Tribe seeks to exercise its treaty rights within park boundaries, throughout the Quileute “Usual and Accustomed Areas.”

The Tribe disagrees with the Park Service’s dismissal of environmental justice requirements. The proposed changes of land status may have a disproportionate effect on members of the Hoh Tribe who are minorities and of a low-income community. The Park Service should consider the effects of land changes to tribal member treaty

rights and economic ability. The Park Service should also take this into account in the omission of hiring any Hoh Tribe members to staff the visitor centers at Kalaloch and Hoh Rainforest. There are a number of proposed actions which may impact the tribe and the Park Service should consider and analyze those impacts in regards to the effects on tribal members and the community.

Response: The general management plan dismissed further evaluation of environmental justice because the initial analysis determined that, while the potentially effected community does include minority and/or low-income populations, the environmental effects of implementing the plan are not likely to disproportionately effect low-income or minority populations. This is fully discussed on pages 47 and 48.

The National Park Service is committed to working collaboratively with area tribes throughout the implementation phases of the general management plan to prevent potential disproportionate adverse health or environmental effects on tribal members.

Unique Farmlands

Comment: We are uncertain that the assumption that the plan would not impact unique farmlands is correct, for both the alternative B and alternative D for the Lake Ozette region may in fact impact lands that were once farmed and could be farmed again. Further analysis may be required to determine if in fact the actions in the general management plan have “no impacts on primary or unique farmlands” in the Ozette basin.

Response: No area within the park or the proposed boundary expansion area meets the description of prime or unique farmland as provided by 7 U.S.C. 4201(c) (1) (A) or 7 U.S.C. 4201(c) (1) (B); therefore, as explained on page 40 of the *Draft General Management Plan*, this topic was not considered further.

ADDITIONAL TRIBAL CONCERNS

Comment: The author does not grasp the unique situation of the Washington Treaty Tribes with off-reservation reserved rights. Most of the treaty tribes are having access disputes with the Park Service and this issue needs to be corrected.

In the Olympic Peninsula Tribes section of the *General Management Plan* (page 135), the paragraph regarding the “usual and accustomed areas” of the Quileute and Hoh Tribes seems to simplify and may, as a result, inaccurately reflect these areas.

Response: Olympic National Park is committed to continuing and improving its government-to-government relationship with federally recognized tribal governments of the Olympic Peninsula. We have added text about the relationship of the eight tribes to the park on pages 14, 37, and 211-214 of the final plan, and have updated the language on pages 14 through 17 to include more information on the trust relationship between American Indian tribes and the federal government.

Information on the “Usual and Accustomed Areas” for the Quileute Tribe was obtained from *United States v. Washington*, Finding of Fact No. 108, 384 F. Supp. 372, and information on the Hoh “Usual and Accustomed Areas” was obtained from *United States v. Washington*, Finding of Fact No. 39, 384 F. Supp. 359.

Comment: The Park Service is not master of its domain. It shares jurisdiction with the eight tribes listed throughout the *Draft General Management Plan*, with Washington Department of Natural Resources, Department of Fish and Wildlife, Department of Ecology, Olympic Coast National Marine Sanctuary, U.S. Fish and Wildlife Service, Environmental Protection Agency, and others. This multiple jurisdiction deserves a full discussion in your opening selections.

Response: The Park Service recognizes that the eight tribes, the state of Washington and other federal agencies have jurisdiction within Olympic National Park through treaties, statutes, executive orders, and other law and policy.

Some of the laws and regulations that apply to Olympic National Park are listed on pages 10 and 11 of the *Draft General Management Plan*. However, this list is not intended to be all inclusive, as it is outside the scope of a general management plan to define the precise nature and extent of all governmental or agency jurisdictions within the boundaries of the park.

For instance, the Park Service recognizes that tribes have jurisdiction over their own members exercising off-reservation treaty fishing rights

within Olympic National Park. The Park Service recognizes that its coastal boundary overlaps the Olympic Coast National Marine Sanctuary boundary (page 110) which is the “higher high water line” adjacent to park lands. The Park Service recognizes that the state of Washington ceded exclusive jurisdiction to the United States over lands within Olympic National Park, retaining jurisdiction to serve civil and criminal process and to tax, and retaining jurisdiction over certain highways (Page 149) (See also, RCW 37.08.210). However, it is beyond the scope of this *Draft General Management Plan* to prepare a comprehensive jurisdictional inventory of Olympic National Park.

Comment: Page 76 states: “Designate river and stream access/crossing points, and use barriers and closures to prevent trampling and loss of riparian vegetation.” This might affect fishing access for Quinault fishers, which should be addressed so as not to impair treaty protected fishing rights.

Response: The Park Service recognizes the Quinault Nation’s treaty rights to fish, hunt, and gather as these rights have been legally defined. Further defining the application of tribal treaty rights is beyond the scope of the general management plan, and it is not our intent to diminish treaty rights or otherwise resolve unadjudicated treaty rights in the general management plan. This has been clarified in the *Final General Management Plan*. Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

Consultation

Comments: Consultation on projects in essential fish habitat need to be with the tribe as well as NOAA Fisheries.

The section on the management of fish and wildlife does not, but should include consultation with affected tribal governments regarding projects within essential fish habitat.

That plan states that park operations and wilderness functions are coordinated in the park to manage and protect natural and cultural resources in wilderness and preserve wilderness character. This section does not mention coordination with the tribes and it should.

The Nation is interested in forming a long-term working relationship to address our ongoing concerns over the plan, its implementation, and other issues affecting the Nation as a neighbor to the park. We want to establish a meaningful consultation process that will result in meeting both the park’s goals and the Nation’s goals.

Response: Olympic National Park is committed to continuing and improving its government-to-government relationship with federally recognized tribal governments (see page 12 of *Draft General Management Plan*). In accordance with the Presidential Memorandum of April 29, 1994 and Executive Order 13175, “Consultation and Coordination with Indian Tribal Governments,” Olympic National Park will continue to work with Indian tribes on a government-to-government basis to address issues concerning Indian tribal self-government, trust resources, and Indian tribal treaty and other rights and concerns, including projects that occur within essential fish habitat. We have updated the final plan to clarify this.

Olympic National Park will work closely with the tribes in implementing the general management plan to ensure that existing treaty rights are not affected by actions within the plan. This has been clarified in the final plan. Olympic National Park will continue to work with the tribes as the wilderness management plan and other plans are developed to address tribal concerns and ensure that existing treaty rights are not affected by actions within these plans.

We have modified the text on page 32 of the final plan, Objective 6, under “Parkwide Policies and Desired Conditions” to read “Park operations and wilderness functions are coordinated in the park to manage and protect natural and cultural resources in wilderness and preserve wilderness character. Management is coordinated with the U.S. Forest Service to provide consistency in regulations, standards, and guidelines to the extent feasible. The Park Service will continue to work with other local and regional groups, communities, and agencies, and tribal governments to preserve wilderness values.”

Comment: The effects on the Hoh Tribe of implementing alternative C with its overall mission of increasing visitation were not adequately reviewed. The Tribe may be impacted in a number of ways including more congestion on roadways, increased competition for natural areas, potential increased disturbance in hunting/gathering areas,

and competition for future economic development among others. How will relocation of Highway 101 in the Kalaloch area impact tribal clamming and gathering? How will it affect transportation to major population or business centers? The Hoh Tribe has a long-term desire to acquire more land in the vicinity and create a tribal-managed campground and/or RV park. Will the park's increase in campgrounds directly compete with the Tribe?

Response: Alternative C includes improvements to, not expansion of, the campgrounds at Kalaloch (see page M36). Alternative C also calls for the Hoh campground to be relocated out of the floodplain (M31). If no location in the park were to be determined feasible, the National Park Service would work with outside entities, including area tribes, to develop camping opportunities outside the park.

Also, under the preferred alternative, there will be no large expansion of campgrounds within the park. There may be slight increases in sites or redesigned/relocated of campsites or campgrounds at Sol Duc and Ozette; in other areas, campgrounds will be retained as feasible (such as at the Hoh, Kalaloch, and South Beach).

Alternatives C and D both call for the National Park Service to work with the Washington Department of Transportation to explore options for relocating portions of Highway 101 outside the coastal erosion zone to ensure future access for visitors and through traffic (pages M35 and M36). As stated on page 302, in the section "Environmental Consequences of Alternative C," there could be road closures or access restrictions during construction, resulting in short-term adverse impacts to traffic, but in the long-term, there will be beneficial effects by maintaining the roadway in a more sustainable manner. The goal of both alternatives C and D is to maintain access, and nothing in these alternatives will diminish existing tribal treaty rights.

Employment

Comment: The Hoh Tribe feels that there should be at least one full-time position at each of the park visitor centers (Hoh Visitor Center and Kalaloch Information Center), to provide for Native American culture and heritage as it relates to the local environment. The Hoh Tribe envisions this as a position that should be funded by the National

Park Service preferably or perhaps a joint grant obtained between the tribe and the park, but the position should be a Hoh Tribal, not a National Park Service employee. The position would provide long-term employment for Hoh Tribal members. While it may be easier to find alternate funding for a youth position, we feel the position should instead be a mature individual that has a background in tribal culture, history, and traditions.

Response: Park staffing and hiring practices are beyond the scope of a general management plan, but the Park Service nevertheless appreciates the Hoh Tribe's concerns related to tribal representation on the staff at the Hoh Visitor Center and Kalaloch Information Center. We are quite willing to work with the Hoh Tribe to identify alternative funding sources and to work within current federal hiring authorities. The park's current funding levels do not allow for creating new positions. Over the past three years, the Park Service has intentionally left over 30 permanent positions unfilled after employees retired or transferred, as there has not been adequate funding to fill these job vacancies. Alternative funding sources might also be restricted because the Park Service is limited by the types of appropriation that may be used for hiring permanent employees.

We commit to sending job announcements to all eight tribes for available National Park Service job opportunities. If the National Park Service obtains funding for any new positions, we will consider qualified tribal members along with other qualified applicants for these positions. In addition, we are quite willing to work with the tribes to seek grants for hiring tribal positions to work in the park.

Comment: Ethnographic Representation at the Hoh Rainforest and Kalaloch Visitor Centers. Geographically, the Hoh Tribe is the most isolated tribe from major employment and population centers. In the socio-economic section of the *Draft General Management Plan*, the Hoh Tribe has the distinction of having the highest unemployment rate and lowest per capita income of any reservation surrounding the park. The Park Service mentions, at its visitor centers in a number of ways and through literature, the Hoh Tribe and its members and their heritage in the area. However, to date there has been no effort by the Park Service to bring actual Hoh Tribe members into the public awareness at these two visitor centers. The Tribe feels that it would be of great value to the 250,000 plus visitors

each year if they were able to meet and speak with a Hoh Tribal member at one of these visitor centers.

Response: Alternative D, the preferred alternative, calls for partnerships with area tribes and other agencies that will result in a better understanding of shared values and issues, and lead to more integrated interpretive and educational programs that address multiple audiences (pages 335 and 336). A new multi-agency/tribal visitor facility within or outside the park in the Kalaloch area, focusing on coastal resources, will offer greater and more in-depth interpretation of the cultural and natural resources and heritage of the coastal area (page 334). The park is committed to working closely with the tribes to develop appropriate exhibits and information on area tribes and ethnographic resources.

Comment: The Center should offer Hoh Tribe members a means to consign tribal crafts and articles for visitors to purchase.

Response: This level of detail is beyond the scope of the general management plan, however, the National Park Service has a variety of mechanisms to allow the sale of native crafts and articles to the public and we would be happy to explore these with the tribe. These include working through contracted concessioners (e.g. Kalaloch), through the cooperating association which provides book and map sales at the Hoh Visitor Center, or through special use permits. Sales may also be authorized as part of cultural demonstrations given for the public. Again, we will be happy to work with the tribe, within the limits of our authorities, to pursue ways for this to happen.

Fisheries Resources

Comment: Under “Native Species” on page 23, the strategy to promote harvest and management practices that protect wild salmonids is admirable. However, it appears to be an effort by the National Park Service to insert itself into a well-defined and litigated system of salmonid management that involves the State of Washington and the recognized treaty tribes of the Olympic Peninsula working together as co-managers of said resource. While the National Park Service may have interests in these activities, those interests must be treated similar as any other interested party. In addition, National Park Service should be cognizant that its role in prescribing management practices is to be

limited to those portions of streams and rivers within its existing boundaries. Advocating for regulatory changes outside of the park boundaries on the manner of harvest regulations, seasons, etc., in effect interferes with the rights of state and treaty tribe co-managers acting to protect each entities specific management rights.

On page 23 under “Native Species” add after “Promote harvest and management practices that protect wild salmonids. Work with area fisheries managers to implement escapement levels necessary to achieve the full role of anadromous fish in the ecosystem...” in cooperation with tribal governments to preserve and promote sustainable, harvestable levels of fish populations.

Response: We have updated the text in the final plan to reflect cooperation with tribal governments.

In accordance with NPS *Management Policies 2006* (4.1.4.) the National Park Service will pursue opportunities to improve natural resource management within parks and across administrative boundaries by pursuing cooperative conservation with public agencies, appropriate representatives of American Indian tribes and other partners.

Olympic National Park fishing regulations apply only to areas within the park’s boundaries and support the protection of anadromous fish in the ecosystem. We believe that without National Park Service fishing regulations regulating the amount of non-Indian harvest on park lands, escapement levels developed by the tribes and the state may not be achieved.

The enabling legislation for Olympic National Park specifically states, “...nor shall any fish be taken out of any of the waters of the park, except at such seasons and at such times and in such manner as may be directed by the Secretary of the Interior. The Secretary of the Interior shall make and publish such general rules and regulations as he may deem necessary and proper for the management and care of the park and for the protection of property therein” (Section 3). Nothing in the Act affected the rights reserved by treaty to the Indians of any tribes (Section 5). Regulations are published in 36 CFR 7. 28 and fishing regulations are updated annually in coordination with the State of Washington and Olympic Peninsula tribes.

Comment: The Park Service's assertions that it has co-management responsibilities over fish and

shellfish harvest are unacceptable and must be stricken from the plan.

Response: The Park Service is not described as a “co-manager” in the *Draft General Management Plan*. To the extent the comment refers to the role formally recognized by the court under its continuing jurisdiction in *U.S. v Washington*, the Park Service agrees that it has not been formally recognized under the case law as a “co-manager” and, consequently, the term is not used in either the *Draft* or the *Final General Management Plan*.

However, the Park Service does have a role in the management and administration of resources. Its role as manager of the non-Indian fishery within the park is established by statute, regulation, by the state of Washington’s cession of jurisdiction, and by deed. (See 36 CFR 7.28, and the July 28, 1988 Governor’s Deed from Washington State Parks and Recreation Commission to the United States conveying the State’s right, title, and interest to the tide lands in Jefferson and Clallam Counties subject to a covenant requiring the National Park Service to consult with the State, and to keep the tide lands “open to fishing and to the taking of shellfish in conformity with the laws and regulations of the State of Washington.”) The Park Service attempts to comply with the state in this regard. This information has been clarified in the final plan in Chapter 1 under “Laws, Regulations, and Servicewide Mandates.”

In accordance with National Park Service policies, the Park Service will continue to pursue opportunities to improve natural resources management within the park and across administrative boundaries by pursuing cooperative conservation with public agencies, appropriate representatives of American Indian tribes, other traditionally associated peoples, and private landowners (NPS *Management Policies 2006*, 4.1.4). We will continue to develop agreements, when appropriate and in accordance with National Park Service policy, with federal, tribal, state, and local governments and organizations to coordinate plant, animal, water, and other natural resource management activities in ways that maintain and protect park resources and values.

Comment: Language specific to “jurisdiction over shellfish harvest” should specify that Olympic National Park has no jurisdiction over beach access or resource harvest by members of treaty tribes. Nor does Olympic National Park have jurisdiction

over setting annual harvest goals or allocations which are determined by the state of Washington and the treaty tribes as co-managers.

Response: The intertidal zone of Olympic National Park is an area of exclusive federal jurisdiction. This information has been clarified in the final plan under “Affected Environment — Intertidal Areas.” As such, the National Park Service is the manager of non-tribal natural resources in this area. The National Park Service has a legal right to set harvest goals and annual allocations for the non-tribal public. Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

Comment: The Nation disagrees that the Olympic National Park has any role to implement escapement goals. The second sentence “Work with area fisheries managers to implement escapement levels necessary to achieve the full role of anadromous fish in the ecosystem” should be deleted.

Response: “The National Park Service will pursue opportunities to improve natural resource management within parks and across administrative boundaries by pursuing cooperative conservation with public agencies, appropriate representatives of American Indian tribes and other partners” (NPS *Management Policies 2006*, 4.1.4. Partnership Policies). The National Park Service will continue to coordinate park actions with the tribes and the state. The National Park Service also recognizes that fish management and other activities outside the park boundary may affect resources within the park.

Park angling regulations are set annually in consultation with Washington Department of Fish and Wildlife and Olympic Peninsula tribes. Olympic National Park fishing regulations support protection of anadromous fish in the ecosystem. We believe that without National Park Service fishing regulations regulating the amount of non-Indian harvest on park lands, escapement levels developed by the tribes and the state may not be achieved.

The enabling legislation for Olympic National Park specifically states, “...nor shall any fish be taken out of any of the waters of the park, except at such seasons and at such times and in such manner as may be directed by the Secretary of the Interior. The Secretary of the Interior shall make and publish such general rules and regulations as he may deem

necessary and proper for the management and care of the park and for the protection of property therein” (Section 3). Nothing in the Act affected the rights reserved by treaty to the Indians of any tribes (Section 5). Regulations are published in 36 CFR 7.28 and fishing regulations are updated annually in coordination with the State of Washington and Olympic Peninsula tribes. Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

Comment: The Nation takes issue with the lack of scientific basis for the no-harvest decision.

Response: Federal regulations prohibit the harvest of wildlife and plants in Olympic National Park. Recreational fishing, including the harvest of razor clams and other non-fish marine species, is allowed, subject to National Park Service management policies that require harvested species to be managed so there is no effect on the natural distributions, densities, age-class distributions, and behavior of the harvested species, or on native species that use, or are used by the harvested species. Park fishing regulations do not affect tribal treaty rights.

Fisheries management in the National Park Service is directed by policy and guidelines with roots in the National Park Service Organic Act of 1916. The Act directs the National Park Service to manage parks to “conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”

The primary objectives of fisheries management, including razor clams and other non-fish species, in the National Park Service are to 1) maintain naturally functioning aquatic ecosystems; 2) protect and perpetuate native aquatic species and natural habitats; 3) focus on preserving or restoring the natural behavior, genetic variability and diversity, and ecological integrity of native fish populations; and 4) provide quality and diverse recreational fishing opportunities only when ecosystem impacts are minimal.

The scientific basis for recreational angling is based on monitoring of trends in abundance of Olympic National Park stocks by National Park Service, Washington Department of Fish and Wildlife, and

treaty tribes. Additionally, fishing regulations are set annually in consultation with Washington Department of Fish and Wildlife and Olympic Peninsula tribes. Olympic National Park fishing regulations generally emphasize catch-and-release of wild fish and retention of hatchery and non-native fish.

Comment: The Tribe is very interested in acquiring data that the Park Service is using to determine baseline conditions; the Park Service should consult with the Tribe on the suitability of data used for such purposes in all environments, not just the marine environment.

Response: The Park Service is happy to share baseline natural resources data with area tribes. These data can be made available to the tribes as soon as data management procedures and quality assurance are completed. The park is committed to collaborating and consulting with the tribes.

Partnerships with Area Tribes

Comments: The purpose of the general management plan should be expanded to include: What are the ways and to what extent can the Park Service work with the tribes to protect their established rights and interests regarding issues and resources affected by Olympic National Park?

On page 41, under Tribal Relations, add, “How can the Park Service work to improve tribal member opportunities in the park?” and

“How can the Park Service work to ensure treaty rights for tribal members?”

The Park Service thus far has not had a very good record in making and keeping cooperative partnerships and agreements with the tribe. The tribe is very interested in working with other resource co-managers in the tribe’s “Usual and Accustomed” Areas.

The Tribe would like to work more cooperatively and collaboratively with the park, and be involved in more park projects, including having a tribal member on site during project work and having a plan for discovery.

Response: Olympic National Park is committed to continuing and improving its government-to-

government relationship with federally recognized tribal governments (see page 12 of *Draft General Management Plan*). Olympic National Park will continue to work with Indian tribes on a government-to-government basis to address issues concerning Indian tribal self-government, trust resources, and Indian tribal treaty and other rights and concerns.

The Park Service reaffirms its policy concerning trust resources and will “interact directly with tribal governments regarding the potential impacts of proposed National Park Service activities on Indian Tribes and trust resources”...and “will ensure that effects on trust resources are explicitly identified and evaluated in consultation with potentially concerned tribes and that they are addressed in planning, decision, and operational documents.” (NPS *Management Policies 2006*, 1.11.3) The Park Service also recognizes case law that federal agencies must ensure that treaty reserved rights are not impaired or abrogated by the action of federal agencies.

The text on page 53 has been updated in the *Final General Management Plan* to more accurately reflect the park’s goals of improving coordination and cooperation with the tribes to better protect park resources, improve natural resource management, and provide visitor opportunities.

The Park Service is committed to pursuing opportunities to improve natural resource management within the park and across administrative boundaries by pursuing cooperative conservation with American Indian tribes in accordance with Executive Order 13352, “Facilitation of Cooperative Conservation” and NPS *Management Policies 2006* (4.1.4). Examples of these opportunities include developing agreements with tribal governments, when appropriate, to coordinate plant, animal, water, and other natural resource management activities in ways that maintain and protect park resources and values. Cooperative conservation may also involve coordinating management activities, integrating management practices to reduce conflicts, coordinating research, sharing data and expertise, exchanging native biological resources for species management or ecosystem restoration purposes, establishing native wildlife corridors, and providing essential habitats adjacent to or across park boundaries.

In accordance with NPS *Management Policies 2006*, the National Park Service will support the establishment of formal and informal agreements with tribes, outside the general management plan process. An example is the agreement between the Park Service and the Lower Elwha Klallam Tribe to restore the Elwha River ecosystem and fisheries. We are currently working with the tribes to interpret traditional basketry in the form of a book, *From the Hands of a Weaver: Olympic Peninsula Basketry through Time* that is similar to *Native Peoples of the Olympic Peninsula: Who We Are*, which was another intertribal and park project.

The Park Service is currently working with the Olympic Peninsula Intertribal Cultural Advisory Committee and would support other partnerships with area tribes.

Comment: The Tribe would like to work with the National Park Service to develop a mechanism that encourages park visitors who intend to use the Ozette parcel to obtain tribal permits in addition to park permits.

Response: The National Park Service is interested and willing to work with the Tribe to encourage park visitors to obtain tribal permits to use the Ozette parcel.

Comment: Include tribal participation in education and outreach; invite Tribe to help train park staff; improve signs throughout the park regarding treaty rights.

Response: Olympic National Park staff and visitors have benefited from tribal participation in staff training and in the development of educational materials and programs (e.g. exhibits, brochures) in the past and hope this involvement will continue and be expanded in the future.

While the details of staff training and park signs are beyond the scope of this plan, the plan does identify the need to expand the number and variety of education programs (page 148). One of the desired conditions for “Visitor Use and Experience, Education and Outreach” is that education programs are available; one of the strategies to accomplish this is to develop outreach programs for and with area tribes (page 33).

The preferred alternative calls for the Park Service to partner with outside agencies and tribes to develop opportunities for regional education and interpretation (page 68). The preferred alternative includes education partnerships with area tribes, with the goals of developing better understanding of shared values and issues, and more integrated interpretive and educational programs (pages 335 and 336). See also pages M28, M36, M44.

Comment: The Quinault Nation is very interested to work with the Park Service to display our tribal culture in the park.

Response: While the details of interpretive displays and projects are beyond the scope of this plan, the Park Service is committed to working closely with the tribes to develop appropriate programs, exhibits and information on area tribes and tribal cultures.

Working collaboratively with the Quinault Nation to expand the types of education currently offered will help achieve the desired conditions and strategies shown on page 33 of the *Draft General Management Plan*. The preferred alternative calls for partnerships with area tribes and other agencies that will result in a better understanding of shared values and issues, and lead to more integrated interpretive and educational programs that address multiple audiences (pages 335 and 336).

Comments: The Park Service should also partner with the Tribe on noxious weed control in the drainage since the park may have infestations on either side of lands that the Tribe is doing control operations on.

The Park Service should coordinate noxious weed control programs with the Nation to maximize the efficiency and effectiveness of controlling noxious weeds upstream and downstream of reservation boundaries.

Response: The Park Service appreciates the existing collaboration (through the Olympic Knotweed Working Group and Elwha Restoration Project) with seven peninsula tribes on exotic plant control and plans to continue this collaboration in the future. Expanding this sort of cooperative effort to include all eight peninsula tribes would be beneficial to all parties.

Comment: The Park Service should partner with the tribes to obtain funding for wetland regeneration and protection in lands outside the

park. These areas between the upper sections of the park and the coastal sections are still important, especially regenerating wetlands that may feed the water table to park lands below.

Response: According to *NPS Management Policies 2006* (1.6), cooperative conservation beyond park boundaries is necessary as the National Park Service strives to fulfill its mandate to protect park resources and values. On page 16, we identified strategies related to ecosystem management, including collaborative planning efforts with adjacent land managers and tribal governments.

While the specifics of implementing these strategies is beyond the scope of the general management plan, the Park Service would be happy to collaborate with area tribes in cooperative conservation efforts, within the limits of our authority and as staffing levels permit.

Comment: The Park Service should partner with the Jamestown S'Klallam Tribe to develop a visitor interpretive center in Blyn.

Response: The preferred alternative calls for the Park Service to partner with outside agencies and tribes to develop opportunities for regional education and interpretation (page 68). This alternative also includes education partnerships with area tribes, with the goals of developing better understanding of shared values and issues, and more integrated interpretive and educational programs (pages 335 and 336).

While the details of specific projects are outside the scope of this plan, the Park Service is interested in working with all area tribes to develop education partnerships and opportunities.

Project-Specific Questions

Comment: No plans or actions addressed restoration or mitigation projects in the Hoh River valley. Recognizing that not all habitat-loss mitigation projects could be listed in the plan, the Hoh Tribe identified three projects that should be included as priority. These projects should be prioritized separately from any road maintenance issues that may arise in the near future that would require consultation with the tribe and may warrant modification to mitigation priorities. The projects to be added to the Olympic National Park Plans and Actions section are as follows:

1) Fish access into “Boundary Pond” on the Upper Hoh Road. Conduct an assessment of alternatives including an alternative that links the adjacent wall-based channel to the east into Boundary Pond and provides an appropriately sized outlet from the east end of Boundary Pond to an existing channel south of the road that provides access from the river to the Pond. This alternative should include a log jam component that would provide protection to the pond outlet and the road from future river meander.

2) Our primary concerns regarding the current draft plan relate back to previous resource issues and management agreements between the Hoh Tribe and the Olympic National Park. Previous mitigation agreements have not been honored by the Park Service that dealt mainly with fish passage (Boundary Pond, Taft Pond and outlet channel, E. and W. Twin Creek culvert replacements) and replacement and maintenance of the primary access (Upper Hoh Road in the vicinity of Boundary Pond) into the Hoh Rain Forest segment of Olympic National Park. These unmet agreements have had serious impacts on the fisheries resource within and downstream of the Olympic National Park boundaries, impeding access for juvenile and adult salmonids into valuable off-channel rearing habitat (Boundary Pond) and potential spawning reaches.

3) Fix two fish barrier culverts on East and West Twin Creek where they cross the Upper Hoh Road within Olympic National Park. Any analysis of alternatives should utilize the Development Advisory Board (DAB) and include all feasible alternatives, including temporary road closures and single lane bridges. Addition of large woody debris to the rip-rap barb located at the mouth of the Taft Pond outlet near the Hoh visitor center.

Response: We have updated the text on pages 48 and 151 of the final plan. The Park Service remains committed to the protection of natural resources and habitat restoration as one of its primary missions and regrets that funding and other resources are not always available to move as quickly as we would like.

The park staff first requested funding in 1996 through the National Park Service line-item construction program to replace the culverts on East and West Twin Creeks because they posed a barrier to fish. The funding proposal was entitled “Remove Salmon Obstructions/Construct Bridges”;

it was eventually funded in 2001 for the amount of \$828,000. Subsequent geotechnical input, traffic flows study, and more specific design development, as well as independent review of the above information and increasing construction costs escalated the cost of the project to over three million dollars. The project went through two Department of the Interior reviews including value analysis to look at all feasible alternatives. Despite this, the project costs escalated to the point where, as per policies, the project was dropped from the funding queue and will need to compete again with projects from throughout the nation with more accurate costs reflected.

In the interim, severe flooding in the side channels along the Hoh road in November 2006 completely washed away the culverts at West Twin Creek and permanent repair of this site will include a two lane bridge. Completion of this bridge is scheduled for early 2008. Minimal damage occurred at East Twin Creek and a funding proposal for that site will be submitted again through appropriate funding channels.

The flooding in November also severely impacted the outlet of Taft Pond, completely blocking it and making it impassable to fish. The outflow has been temporarily reopened but the permanent repair will include woody debris. The Taft Pond and outlet channel project is also in progress and will likely be completed as part of the repairs from the late 2006 storms. The park staff requested project funding to address issues at the Boundary Pond and received it in 2005 and 2006. The engineering design for the Boundary Pond project is currently underway. Until design is completed, it is unclear whether or not the project will be feasible.

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

Response: Desired conditions for rivers and floodplains are shown on page 19. The preferred alternative (page M44) calls for year-round road access to be retained along the existing Quinault area roads, using methods that minimize adverse effects on river processes and aquatic and riparian processes to the extent possible. It also states that if road relocation away from the river meander areas

is feasible, wilderness boundary relocations would be sought and further notes that relocations of the roads might be necessary due to river movement.

Specific project details are beyond the scope of a general management plan and are not included here, but the overall desired condition is to restore natural river processes. Park staff is very interested in sharing and exchanging data with the Quinault Nation in order to promote and enhance understanding of natural resources and shared issues.

Comment: The ONP needs to make it a high priority to relocate its portion of the Upper Hoh Road to outside of the channel migration zone.

Any modifications to the river need direct consultations with the Tribe. As a rule, the Tribe discourages additional impacts on the habitat for the Tribe's fishery resource. The Tribe favors removing long-term impacts to the fishery resource and potential impacts, such as roadways, out of the river channel migration zone to protect the resource long term.

The plan should include government-to-government consultation with the Nation prior to moving the Queets Road.

Response: The preferred alternative calls for the Park Service to work to relocate portions of the Hoh Road outside the active river channel/floodplain if feasible, and to work with tribes and county partners to maintain road access and provide other appropriate services (pages M32 and M40). Olympic National Park will continue to work and consult with Indian tribes on a government-to-government basis to address issues concerning Indian tribal self-government, trust resources, and Indian tribal treaty and other rights throughout the implementation process and in future planning efforts

Comment: The Tribe agreed to work collaboratively with park staff to assist them in soliciting certain funding support for the project and rebuilding the Staircase Rapids trail bridge. Park staff commented that unfortunately, fire suppression needs tend to outweigh this bridge reconstruction as the fiscal year ends. The Tribe believes if the bridge is part of the preferred alternative D, it should not be weighted against fire suppression, but treated as both a cultural and recreational enhancement

Response: We are unsure of the source of this information. Funding for fire suppression comes from an entirely separate funding source than that which would be used to address bridge replacement. Further, a construction project as large as replacement of the Staircase Rapids bridge would require more money than is available at "fiscal year end"; project money would need to be requested.

The park staff applied for storm damage funding in 2003 to repair facilities (including the Staircase Rapids Bridge) throughout the park that had been damaged from previous storms, but none was received. A proposal in the amount of \$425,000 was developed in 2005 to construct a replacement trail bridge at Staircase Rapids. It has been submitted through normal funding calls but has not yet been funded. We would be happy to work collaboratively with the tribe to pursue other sources and opportunities for funding.

Treaty Rights and Trust Resources

Comment: Only nontreaty fishing is regulated. Clarify that the treaty fishing in the rivers, lakes, and tidelands is not regulated by the park.

Response: We have clarified this in the *Final General Management Plan*.

Comments: The Park Service should recognize the Nation's treaty rights to fish, hunt and gather, and the trust responsibility.

One of the over arching issues that the tribe does have with the Park Service is that of the rights of tribal members to hunt, gather, and fish in the land of their forefathers.

Response: The Park Service recognizes the Quinault Nation's treaty rights to fish, hunt and gather as these rights have been legally defined. Further defining the application of tribal treaty rights is beyond the scope of the general management plan, and it is not our intent to diminish treaty rights or otherwise resolve unadjudicated treaty rights in this document. The Park Service is committed to pursuing opportunities to improve natural resource management within parks and across administrative boundaries by pursuing cooperative conservation with American Indian tribes in accordance with Executive Order 13352, "Facilitation of Cooperative Conservation"

and NPS *Management Policies 2006* (4.1.4). The Park Service reaffirms its policy concerning trust resources and will “interact directly with tribal governments regarding the potential impacts of proposed National Park Service activities on Indian Tribes and trust resources . . .” and “will ensure that effects on trust resources are explicitly identified and evaluated in consultation with potentially concerned tribes and that they are addressed in planning, decision, and operational documents.” (NPS *Management Policies 2006*, 1.11.3) The Park Service also recognizes case law that federal agencies must ensure that treaty reserved rights are not impaired or abrogated by the action of federal agencies. Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

Comment: The draft's extensive discussion avoids two treaty issues. The draft fails to state that the Federal Courts have also adjudicated the nature and extent of the Quinault right to hunt, albeit at a lower level than the fishing rights decision.

Response: The Park Service recognizes the Quinault Nation's treaty rights to fish, hunt, and gather as these rights have been legally defined. Further defining the application of tribal treaty rights is beyond the scope of the general management plan, and it is not our intent to diminish treaty rights or otherwise resolve unadjudicated treaty rights in this document. Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

Comment: The park service has a heightened duty and fiduciary obligation to not only acknowledge these treaty rights, but to take clear, meaningful steps to protect them through the plan. The Nation's interest must be elevated above those of the general public and the plan should explicitly state this. The balance must weigh in favor of resources protection (not access by the public) when treaty rights are implicated.

Response: We have updated the *Final General Management Plan* to include more specific language about area tribes and treaty rights (pages 211-214). We have added text about the relationship of the eight tribes to the park on page 14-17, have provided more information on pages 37-38, and have updated the language on pages 14-17 to include more information on the trust relationship between American Indian tribes and the federal

government. More specific language regarding the development of partnerships and agreements with area tribes and the park's commitment to work closely with the tribes to protect resources was added to page 54 in the final plan. We have updated the language under “Parkwide Policies and Desired Conditions - Exotic Species” to state that the National Park Service will work with tribes and neighboring land managers to control or eliminate exotic plants (Page 29 of the final plan).

Tribal interests and issues were taken into account in the *Draft General Management Plan* in terms of ecosystem management (page 16), fire management (page 17), water resources (page 18), marine resources (page 21), native species (page 23), rare, threatened and endangered species (page 25), cultural resources, including archeological sites and ethnographic resources (pages 28-32), and visitor use and experience (page 33).

As stated on pages 10 and 11, Olympic National Park is managed under several laws, including the National Park Service Organic Act, The National Park Service General Authorities Act, and the Olympic National Park establishing legislation. The first two laws establish the fundamental purpose of all parks, including providing for the enjoyment of park resources and values by the people of the United States (NPS *Management Policies 2006*, 1.4.3). In addition to the establishing legislation, there are other laws that apply to the park (see page 11). As stated previously, the National Park Service must also honor its legal responsibilities to American Indian tribes as required by the Constitution of the United States, treaties, statutes, and court decisions (NPS *Management Policies 2006*, 1.11).

The general management plan is not intended to diminish treaty rights or have any influence over the resolution of unadjudicated treaty rights.

Comment: Regarding “Usual and Accustomed Area” lands — Throughout the *Draft General Management Plan* the off-reservation right of the tribes is inadequately and sometimes erroneously described. Only on page 133 is the discussion adequate. There are numerous references prior to page 133 and no explanation of why these eight tribes should matter within park boundaries. On page 4 the drafter briefly discusses the tribe's relation to the lands in the park (add "water"). It is more than a relationship; it is shared ownership of the resources.

Response: We have added text to pages 14-17 in the final plan to clarify this information. The United States recognizes the right of Indian tribes to self-government and to exercise inherent sovereign powers over their members and territory. In accordance with Executive Order 13175 of November 6, 2000, the United States will continue to work with Indian tribes on a government-to-government basis to address issues concerning Indian self-government, tribal trust resources, and Indian tribal treaty and other rights.

In accordance with NPS *Management Policies 2006* (1.11), the National Park Service has a unique relationship with American Indian tribes, which is founded in law and strengthened by a shared commitment to stewardship of land and resources. The Park Service will honor its legal responsibilities to American Indian tribes as required by the Constitution of the United States, treaties, statutes, and court decisions.

The formal legal rationale for the relationship between the National Park Service and tribes is augmented by the historical, cultural, and spiritual relationships that American Indian tribes have with park lands and resources. Olympic National Park will pursue an open, collaborative relationship with the eight American Indian tribes to help tribes maintain their cultural and spiritual practices and enhance park staff understanding of the history and significance of sites and resources within the park.

Comment: Add to page 48: US v Winans language addressing treaty rights, and the rights of tribes to harvest fish on private lands as well as public ones throughout their “Usual and Accustomed Areas.” This right continues to this day and was never abrogated with the establishment of the park.

On page 48, the plan states that the National Park Service does not manage Indian assets and that overriding mandate is to manage the park consistent with park laws and regulations. This statement disregards the park's responsibility to protect Indian assets within the park.

The document does not discuss treaties in the same section as the laws (statutes) that govern the park and this should be addressed.

Response: The management of the national park system is guided by the Constitution, public laws, treaties, proclamations, executive orders, regulations, and directives of the secretary of the

interior and the assistant secretary for fish, wildlife and parks. National Park Service policy applies these authorities, including the Olympic National Park enabling legislation that states “nothing [herein] shall affect...the rights reserved by treaty to the Indians of any tribes.”

As stated on pages 10 and 11, Olympic National Park is managed under several laws, including the National Park Service Organic Act, the National Park Service General Authorities Act, and the Olympic National Park enabling legislation. The first two laws establish the fundamental purpose of all parks, including providing for the enjoyment of park resources and values by the people of the United States (NPS *Management Policies 2006*, 1.4.3). In addition to the park's enabling legislation, there are other laws that apply to the park (see page 11).

As stated previously, the National Park Service must also honor its legal responsibilities to American Indian tribes as required by the Constitution of the United States, treaties, statutes, and court decisions (NPS *Management Policies 2006*, 1.11). The information on treaties has been added to the final plan in Chapter 1 under “Regional Context” and also under “Federally Recognized Tribes.” Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

It is not the National Park Service's intent to expand or diminish those authorities in this general management plan. The general management plan is not intended to diminish treaty rights or have any influence over the resolution of unadjudicated treaty rights.

Comment: The plan must allow maximum flexibility for the Park Service to act in its role as trustee in protecting resources of particular interest to the nation. Nowhere in the alternatives evaluations does the *Draft General Management Plan* state how the Park Service considered tribal interests in seeking this balance (to allow for public access and protect natural resources).

Response: The National Park Service is committed to continuing and improving its working relationships with the eight tribes of the Olympic Peninsula and would be happy to work collaboratively with the tribes, including the Quinault Indian Nation, to establish restoration

goals and priorities for river systems and other resources within the park.

As noted previously in this Comment and Response section, several executive orders, and National Park Service *Management Policies 2006* (1.11) establish the direction for National Park Service and responsibilities to tribes; section 1.11.1 clearly explains the government-to-government relationship.

In developing this general management plan, the National Park Service sought tribal input throughout the planning process, beginning in 2001. Tribal input was requested about issues to be addressed in the plan and tribes were asked for information and feedback as the *Draft General Management Plan* was developed. As described on page 355, the Park Service requested to meet with all eight tribes to discuss the planning process; at least one meeting was held with each tribe. The National Park Service offered to hold formal government-to-government consultation meetings with all of the tribes to discuss *the Draft General Management Plan*; six of the tribes requested meetings.

Many issues were brought forth by the tribes. Some issues were considered within the scope of the general management plan (e.g. protection of cultural resources). Other issues were too detailed to be included in a general management plan or were outside the scope of the plan (e.g. selling crafts and tribal wares at park visitor centers). The Park Service is committed to working with the tribes to resolve those issues through other plans and agreements after finalization of the general management plan.

Throughout the planning process, the National Park Service reviewed laws, treaties, executive orders, and National Park Service policies (NPS *Management Policies 2006*, 1.11.3) which establish policy and direction for the protection of trust resources. The *General Management Plan* includes measures to protect park resources throughout the section on “Desired Conditions and Strategies.” Trust resources will also be protected within this framework. (See pages 19, 23, and 25). The desired conditions were established for overall resource protection and in consideration of the potential effects on trust resources. The strategies outlined in the *Draft General Management Plan* are not considered an all-inclusive list. We expect that additional strategies will be developed over time in collaboration with area tribes and other entities.

In addition, the National Park Service is willing to develop informal and formal agreements to work with the tribes to protect resources, similar to what occurred within the framework of the Elwha River Restoration Plan.

Comments: Makah Rights to Whale and Seal. The draft plan mentions that the Makah Tribe retains the treaty right for “whaling and sealing at usual and accustomed grounds and stations.” The nature and extent of the Makah right has not been [upheld in court]. To be complete, the draft plan should state that the nature and extent of the Makah right to whale and seal has not been adjudicated. Nor has there been any determination that all or portions of the Olympic National Park coastal strip are “usual and accustomed grounds and stations” in the meaning of the Treaty of Neah Bay.

The *General Management Plan / Environmental Impact Statement* should acknowledge that the Tribe’s whaling rights includes the right to use the shore for the purpose of landing and harvesting whales that become stranded on beaches within its usual and accustomed whaling area. The GMP states that whaling “was” an important activity for the Makah, but should also acknowledge the current importance of whaling to the Tribe.

Response: As stated in the *General Management Plan*, the Treaty of Neah Bay and the other treaties secured certain rights to the tribes in exchange for Indian cession of lands and waters that are now within the boundaries of Olympic National Park. The treaties were not a grant of rights to the Indians, but a grant of rights from them, and a reservation of those rights not granted (*United States v. State of Washington*, 384 F. Supp. 312 [1974]: 323). These reserved treaty rights were recognized and included in Section 4 of the bill to establish Olympic National Park (H.R. 4724) in 1938. The clause in Section 4 stipulates that “the rights reserved by treaty to the Indians of any tribe . . . shall not be affected by the establishment of the National Park.” The three peninsula treaties secured the rights of the eight tribes to take “fish at usual and accustomed grounds and stations . . . together with the privilege of hunting and gathering roots and berries on all open and unclaimed lands.” The treaty with the Makah also secured the right of “whaling and sealing at usual and accustomed grounds and stations.” The *Final General Management Plan* has been modified to state that whaling “is” an important activity for the Makah. The general management plan is not intended to diminish treaty rights or have any

influence over the resolution of unadjudicated treaty rights.

VEGETATION

Comment: An important omission is that plants with special status in the state are present in the park, could be impacted by park activities, but are not included in this analysis. We recommend that the analysis of effects include all species that are assigned special status by the Natural Heritage Program.

Response: We have updated the *Final General Management Plan* on page 184 and appendix G to include this information.

Impacts to vegetation, including special status species, is considered in the “Vegetation” section of the “Environmental Consequences” chapter in the *General Management Plan*. More detailed environmental analyses will occur after the final general management plan as site-specific plans and compliance are developed.

Comment: On page 110, native species are mentioned. Not until page 320 are invasive exotics discussed. In any discussion about what species are in the park, it is important to mention the invasive species and how they impact native ones.

Rivers are often the vectors of invasive species. More attention needs to be given to river management in terms of invasive species eradication.

Response: Desired conditions and strategies for managing exotic and invasive plant species are shown on page 24 of the *Draft General Management Plan*. In addition, action items to control or reduce the spread of exotic vegetation are listed as mitigation measures for Vegetation (page 76). The park staff is currently working to control invasive, exotic plants along many rivers, including the Quillayute, Dickey, Sol Duc, Hoh, Elwha, and Big Rivers. The park staff coordinates these activities with area tribes and adjacent property owners and land managers.

VISITOR USE

Access and Stock Use

See also, Wilderness

Comment: If your draft plan is adopted, future access to many varied users, including stock users, will be adversely affected. Zoning horses out [of primeval and primitive zones] means that there never will be the opportunity for horses to utilize these areas should trails be built or circumstances change, which leaves the only backcountry access open to stock a prescribed subset of trails in the Wilderness Trail zone.

Response: Zoning provides a means to define a range of management prescriptions that state the desired condition of resources, the visitor experience, and management facilities for specific areas within the park. The zone descriptions have been included in the final plan, however, the zoning designations within wilderness have been removed from the final plan and they will be included in the future wilderness management plan. It was felt that the *Draft General Management Plan* did not provide enough detailed information for readers to adequately analyze potential changes from current conditions.

Generally, within the wilderness, the wilderness trail zone would allow for greater human-caused impact, higher use levels, and more visitor facilities while the primitive and primeval zones would allow for less human-caused impact, lower use levels, and fewer visitor facilities (pgs 57-61). The wilderness trail zone is where stock use would be considered appropriate, while stock would be excluded from the more pristine primitive and primeval zones (pg 60).

There are no plans under the *Draft General Management Plan* to build additional trails in the wilderness. Under the plan (page 61), there will be a maintained trail system which will include nature, all purpose, multipurpose bicycle (frontcountry), secondary, foot, and primitive trails (these classes are defined in the glossary in the *Final General Management Plan*). All purpose, multipurpose bicycle, and secondary trails would be open to stock throughout the park.

Comment: I have seen that it is proposed that all stock camps above 3,500 feet are to be closed. This creates a crowding concern and safety concern for stock users. It could result in increased impacts in existing stock camps. The reality is there are only

three sites above 3,500 feet, but the closure will have a negative impact on stock use. Further clarification is needed about what appears to be a new policy governing specific use in wilderness without a careful and deliberate discussion and analysis of rationale.

Response: That information was removed from the final plan. However, the Olympic National Park “Superintendent’s Compendium” currently prohibits camping with stock outside designated stock camps above 3,500 feet. Only three stock camps have been designated above this elevation due to sensitivity of the subalpine/alpine vegetation. The final plan now states (page 72) under wilderness zone that “stock use would be allowed only on trails and may be restricted from some trails and sites.” This information will be further clarified in the wilderness management plan.

Comment: The Park Service should monitor and regulate stock use to minimize detrimental impacts in trails and prohibit grazing

Response: The park’s “Superintendent’s Compendium” currently includes provisions that address minimizing stock-related impacts, including grazing. Specific guidance related to future stock use within the wilderness will be developed in the more detailed wilderness management plan.

Comment: No apparent on-the-ground provisions are made to ensure that nonnative plants are not introduced to the park via stock use.

Response: Currently the Park Service prohibits the packing in of any stock feed that contains viable seed, and requires the use of certified weed-free supplemental food on overnight trips. The wilderness management plan, rather than the general management plan, will address more detailed wilderness management issues such as introduction of exotic plants.

Comment: How does the “Right to Ride” legislation affect the general management plan?

Response: The “Right to Ride Livestock on Federal Lands Act of 2005” was introduced in the House on February 2, 2005. On May 16, 2006 it passed and was agreed to in the House. On May 17, 2006 it was received in the Senate and referred to Senate Committee on Energy and Natural Resources where it is currently held. Its purpose is “to preserve the use and access of pack and saddle stock animals on

public lands, including wilderness areas, administered by the National Park Service, the Bureau of Land Management, the United States Fish and Wildlife Service, or the Forest Service where there is a historical tradition of the use of pack and saddle stock animals, and for other purposes.” While the bill has not yet passed, the intent of the general management plan is to continue to allow stock use within Olympic National Park.

Comment: In some areas where there is stock use there is no road access to the trailhead for stock vehicles (e.g. Dosewallips).

Response: Under the preferred alternative, roads might be modified or relocated for resource protection and/or to maintain vehicular access. Stock access will be considered during implementation planning. Currently, Dosewallips Road is closed due to a road washout on U.S. Forest Service administered lands. The U.S. Forest Service is working with the Federal Highway Administration and the National Park Service to restore vehicular access to the Dosewallips, including repairs on the National Park Service portion of the road at Dosewallips Falls. However, due to the grade of the roadway at the falls, it is unlikely that even after the repairs, that stock trailers will be permitted past that point.

Desired Conditions and Strategies

Comment: Add, “Designate quiet areas within campgrounds (similar to no smoking areas) to raise public awareness of the acoustic environment and to offer quieter camper experiences” to the desired conditions and strategies for visitor use and experiences. These quiet areas should be located in an area best suited for listening to nature, for example adjacent to a babbling brook or next to a cliff that reflects distant sounds.

Response: There are many places in park that are quiet. Developed areas are generally those areas accessed by road that visitors expect some level of human-generated noise. “Desired Conditions” include both the encouragement of visitors to minimize noise in campgrounds, and interpretation and education efforts about soundscapes and the value of protecting natural quiet and natural sounds. The designation of “quiet” zones in campgrounds is too detailed to include in the general management plan.

Comment: Under Visitor Use on page 33, one condition and/or strategy not fully discussed is how the general management plan will ensure access to all generations of park users.

The extension of wilderness and focus on additional wilderness experiences appears to be missing the growing demographic of “retiring baby boomers” touring the Nation’s park at a time in their lives where endurance hiking and recreating may no longer be physically possible or their primary objective.

Response: The parkwide policies for visitor use and experience (page 33) address a full range of park experiences, including frontcountry day use visitation, and providing the appropriate roads, trails and related facilities for visitor enjoyment. The National Park Service is mandated to provide, to the extent feasible, programs, services, and facilities in the park that are accessible to and useable by all people, including those with disabilities. The preferred alternative calls for the development of more universally accessible trails in the frontcountry portions of the park, and improvements to visitor facilities — increasing visitor experience opportunities and giving more people access to facilities and the spectrum of activities in the park (page 89).

Comment: Under "Visitor Use and Experience..." add “Develop educational materials that help publicize features of Olympic Park that are not widely recognized but significant (e.g., soundscape and natural quiet).”

Response: The draft plan identifies the desired condition that park visitors will have opportunities to understand and appreciate the significance of the park and its resources. Further, it identifies a strategy to accomplish this by providing a variety of educational opportunities (page 33).

Visitation Figures

Comment: Assumptions regarding increased visitor use could be better documented and analyzed. Concern: The Historical and Projected Visitor Use Chart, Figure 5, at page 173, assumes a single linear regression regarding use patterns from 1990 thru 2005, with a projection through 2009 based on the linear regression for this time period. The data actually shows a significant reduction in visitor use for 2003 and 2004, to levels recorded in the early

1990s. No data is shown for 2005. The time series data may not be linear and upward trending at all, and it is possible that visitor use may be even on the down turn, given the park's relative remoteness and the reliance on out-of-area visitors in automobiles to travel to the park. It is also hard to reconcile a projection only thru 2009 when this planning document is contemplated to serve a time-period of between 15 and 20 years. Second, Olympic National Park use is highly dependent on the seasonal weather — especially huge amounts of rain, and snow in the high country, as well as road and trail access throughout the park.

These constraints define the use season in many areas and for certain user types. Even year to year, use seems to vary depending on the weather, sometimes including the summer months.

Response: Recreation visits in 2005 were 3,142,774 and 2,749,197 in 2006 (our lowest annual recreational visitation statistic since 1993, possibly due to closures related to storm damage). We have provided an updated regression analysis in the final plan. This analysis shows that, while visitor use varies from year to year, the general trend over the years 1990-2005 is one of increasing use. The regression line can be extended simply by applying the regression formula and substituting the year (e.g. 2006) for the x-value. This analysis identifies the trend and does not specifically predict the amount of visitor use accurately for any one year.

Olympic National Park visitation is greatly influenced by seasonal conditions, weather, and other regional events. This is why we use our visitation statistics as trend indicators, rather than precise measurements of the numbers of visitors on any given day or month. We also recognize that our visitation has dipped in recent years, a phenomenon seen throughout the National Park Service. Like the rest of the National Park Service, we are working to invite and engage more people, especially young people and other under-represented groups.

Comment: Stating that “visitation is expected to continue to increase in proportion to regional population” seems naïve and unlikely to prove true over the general management plan's planning horizon.

There is no discussion or distinction regarding park use by local populations as compared to destination visitors (from distances greater than a half day of travel). This could have a significant impact on the

need for expanded campgrounds and other overnight facilities in the park or outside. The only way to reach the Olympic Peninsula is by car (or bus). If the cost of gas continues to rise over the long term, as expected, it may be that destination travelers will diminish over time, and thus the need for campgrounds in the park will remain static. The outcome of a more careful and thorough analysis of visitor use and utilization of existing facilities should reach conclusions regarding visitor use and how that might affect facilities requirements (For example, how often are the various individual campgrounds full on a seasonal basis or how difficult is it to get a back country permit for specific locations during high use periods?). With respect to data contained in several charts and narrative, how does one “visit Lake Crescent?” The lake, for its entire length, is flanked on the south by the only major roadway (US 101) from Port Angeles to Forks, and used by all kinds of vehicles, which may have no relationship to park visits.

Response: A visitor survey conducted in 2000, summarized on page 139, showed that 47% of visitors to Olympic National Park are from Washington State, but further details regarding visitors' home towns are not available. It is therefore reasonable to expect that Olympic's visitation will increase as the state and regional population increase.

Visits throughout the park are divided into “recreational” and “nonrecreational” visits, according to formulas developed through past visitor surveys and detailed traffic counts. At Lake Crescent, only a fraction of the total visitation is recorded as “recreational” in nature.

At Lake Crescent, a traffic counter is located along the westbound lane of Highway 101. The traffic count from the westbound lane is first multiplied by two to estimate the total number of vehicles traveling both eastbound and westbound. This total count is then multiplied by a “recreation proportion factor” to determine the number of vehicles traveling through the Lake Crescent area for recreational use. The recreation proportion multiplier varies according to season. For example, we estimate that 20% of vehicles traveling in winter are on recreational visits, while an estimated 80% of vehicles in August are making recreational visits. For more information on how Olympic visitation statistics are gathered, visit <http://www2.nature.nps.gov/stats/> and click on “Visitation” and “Counting Methods by Park.”

Comment: Cabins and full time residences apparently achieve “visit” status for each day occupied. I may be incorrect on these presumptions, but visit classification needs further clarification.

Response: Neither overnight use nor day use of residential properties within the park is classified as “visitation.” Overnight stays at park campgrounds and lodges are counted, along with wilderness overnight camping.

Comment: How many visitors go into the wilderness?

Response: The *Draft General Management Plan* included wilderness use numbers on page 121. We have data for overnight use only. In 2003, the overnight use levels in wilderness were approaching 94,500 visitor use nights. In 2006, there were 83,420 visitor use nights recorded for overnight wilderness use.

WATER RESOURCES

Comment: The Park Service may have missed an opportunity to discuss and collaborate on the development of instream flows, water quality, and water related habitat issues by not being able to participate in “WRIA 19” or “WRIA 20” planning efforts. The lack of National Park Service participation was specifically noted and raised on certain occasions as discussions involved the various rivers, as well as Lake Ozette, that originate and/or flow through National Park Service territory. In addition, because of the nature in which waterways originate in National Park Service uplands, flow through private and state lands, and discharge in estuaries in and adjacent to National Park Service shorelines, the National Park Service needs to further explain what role it plans to play in water quality issues with regard to the strategy of attaining “the highest possible water quality standards available under the Clean Water Act.”

Response: Park staff has participated intermittently in WRIA planning efforts since they began in the late 1990s by contributing data to these planning efforts, even if they were not present at every meeting. There are nine WRIA's that include or influence park areas and numerous meetings for each one, meaning that staff time and issues must be prioritized. Additionally, the park had only one

fisheries biologist until late 2005 and does not have a hydrologist. As available, park staff will continue to participate in the WRIA planning efforts.

Comment: The summer turbidity of the mainstem of the Hoh River is due to glacial melt releasing suspended particulate material and not only from channel changes and bank undercutting.

Response: The commenter is correct. The Hoh River is cloudy in the summer, even without bank erosion, due to the glacial influence.

Comment: On Table 5, Park Watersheds, *General Management Plan* page 103, we are confused as to why information was “not available” for this table regarding “Percent of Watershed in the Park.” In addition to various local sources, such information could easily be obtained from a simple GIS inquiry.

Response: This information has been updated on Table 7 in the final plan.

Comment: Hubert Glacier drains into the South Fork of the Hoh, yet this stream is classified as non-glacier.

Response: The commenter is correct. This information has been updated on Table 7 in the final plan.

Comment: Ozette River is a drainage river, not a spawning river.

Response: The Ozette River is primarily a drainage river but there is spawning. The majority of the spawning happens upstream from the lake, or in the lake, but fish also spawn in the lower river.

WILD AND SCENIC RIVERS

Comments: All rivers should be considered for wild and scenic river designation

We specifically recommend that the general management plan include an inventory of the eligibility of all major river systems for inclusion into the wild and scenic rivers system and provides protection of natural river processes and critical fish and wildlife habitat.

Under the Wild and Scenic Rivers Act, all federal land management agencies, including the National Park Service, are required in their planning process

to study rivers for eligibility in the national system. Also see *NPS Management Policies 2006* (2.3.2.10)

Response: The National Park Service protects, recognizes, manages, and conserves rivers in a variety of ways. One way is through the Wild and Scenic Rivers Act. In 1989, the National Park Service conducted a preliminary analysis of rivers within Olympic National Park and determined whether they had the characteristics necessary for wild and scenic river designation. Thirteen rivers were determined to be eligible (as listed on page 51 of the *Draft General Management Plan*). According to National Park Service policy, general management plans and other plans may not propose actions that could adversely affect the values that qualify a river for the national wild and scenic rivers system. A determination of eligibility does not require a formal study, nor does it require the National Park Service to seek designation. If a positive determination of eligibility is found, the agency is required to manage the river so as to not diminish the resources and values that caused its eligibility in the first place. If a park manager decides to move forward with a formal study, the study can be done in conjunction with a general management plan, a general management plan amendment, or in a separate NEPA planning process.

Rivers within Olympic National Park were previously evaluated for wild and scenic river eligibility in 1989 as stated on page 51 of the *General Management Plan*. Thirteen rivers were considered eligible. The next step will be to conduct formal suitability studies and associated planning. This information is included on page 81, and has been updated to reflect current National Park Service policies.

Within the general management plan process, Olympic National Park reviewed the existing eligibility studies and determined that formal suitability studies related to wild and scenic rivers designation will be conducted in a separate NEPA planning process after the general management plan is completed (see page 51), due to the high number of rivers involved and the detail needed for these studies. These studies will have added additional volumes to the *General Management Plan*, and added additional time to complete these studies, delaying the completion of the plan, and increasing its size to the point of making the document difficult to use (unwieldy) by many of the public.

Upon completion of the *Final General Management Plan*, formal requests will be made for funding to conduct the suitability studies and associated studies, understanding that a wilderness management plan is the park's next planning priority.

WILDERNESS

Comment: A major concern is that visitor experience is stated as the primary purpose of the park, superseding protection of natural resources and wilderness. The Wilderness Act should be cited (page 33) as one of the laws, regulations, and guidelines that the National Park Service is to follow.

Response: Actually this is not the case. The "fundamental purpose" of the national park system, established by the Organic Act, is to conserve park resources and values, and provide for the enjoyment of those resources and values. The purpose of the park is guided by the enabling legislation, as stated on page 9 of the *Draft General Management Plan*; it is also guided by other laws and legislation. The National Park Service is required to determine the balance between visitor use and resource and wilderness protection. According to NPS *Management Policies 2006*, when there is a conflict between the two, conservation is to be predominant (1.4.3).

Specific laws and policies for wilderness, including the Wilderness Act, are included on page 11 under "Laws, Regulations and Servicewide Mandates and Policies" and in the table on page 26, under "Desired Conditions Based on Servicewide Mandates and Policies." The Wilderness Act is also cited on page 117 under the "Wilderness Values" section of the "Affected Environment" chapter. We have updated chapter 1 to include the Washington Wilderness Act of 1988 to the "Laws, Regulations, and Servicewide Mandates and Policies" section.

Comment: I believe today, nationally, there are presently 106 million acres of designated wilderness areas. When President Johnson signed the law there was 9.2 million acres.

Response: When the Wilderness Act was passed in 1964, 54 areas (9.1 million acres) were designated as Wilderness. The National Wilderness Preservation System, as of February 28, 2007, now includes 107,436,642 acres in 702 areas. Source: <<http://www.wilderness.net>>

Cultural Resources, Cultural Landscapes

Comment: There is no support for maintaining "historic feeling and appearance" of [cultural] landscape in wilderness.

Response: There is support for maintaining cultural landscapes within the park (see page 52 of this volume). Laws pertaining to historic preservation remain applicable in wilderness but must generally be administered to preserve the area's wilderness character (NPS *Management Policies 2006*, 6.3.8).

As stated on page 30 of the *Draft General Management Plan*, in accordance with NPS *Management Policies 2006* (5.1.3.1), the National Park Service will complete a cultural landscape inventory to identify landscapes potentially eligible for listing in the national register and to assist in future management decisions for landscapes and associated resources. For landscapes listed or determined to be eligible for listing in the national register, decisions regarding which treatments will be undertaken will be reached through the planning and compliance process.

The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analysis and decision making concerning cultural resources, including cultural landscapes in wilderness.

Cultural Resources, Historic Structures in Wilderness

Comment: New or old, the Wilderness Act does not allow maintaining structures in wilderness unless they are the minimum necessary for administration of wilderness. The structures identified in the *Draft General Management Plan* do not meet that test.

Response: The National Park Service agrees that structures necessary for the administration of wilderness may be maintained, but disagrees with the statement that the Wilderness Act does not allow maintaining other structures.

As noted above, and as reflected in the recent case law and policy, historic preservation of structures may be allowed if the decision maker reasonably concludes that historic preservation activity will preserve the area's wilderness character and values, using management methods that are consistent with preserving wilderness character and values.

NPS *Management Policies 2006* states that cultural resources that have been included within wilderness will be protected and maintained according to pertinent laws and policies governing cultural resources using management methods that are consistent with the preservation of wilderness character and values (6.3.8).

Comment: Question the use of 16 U.S.C. 1133(a)(3) as basis for placing all cultural resources programs above preservation of wilderness character (re: 1970 Administrative Policies of the National Park Service, p. 55).

Response: The plan has been modified to further clarify law and policy. Laws pertaining to historic preservation remain applicable within wilderness, but must generally be administered to preserve the area's wilderness character. 16 USC 1133(a) (3).

Comment: National Park Service needs to acknowledge in the *Draft General Management Plan* how the Federal court decision in *Olympic Park Associates v. Mainella* affects wilderness management.

Response: The *Olympic Park Associates v. Mainella* decision allowed management of cultural resources in wilderness but only insofar as to also preserve Olympic National Park's wilderness character. This paradigm is now reflected in NPS *Management Policies 2006*, and changes to the *Final General Management Plan* have been made to reflect this holding and the recently revised National Park Service policy.

Comments: A recent court decision clearly mandated that wilderness be afforded a higher legal priority than historic preservation. In blatant disregard of that ruling, the draft plan proposed to repair/preserve dozens of structures and cultural sites. See also PEER letter.

Alternative D envisions repairing or reconstructing dozens of deteriorated, old cabins and shelters in the wilderness areas, mostly remnants of activities before the park was established.

Response: The holding in *Olympic Park Associates v. Mainella* has not been ignored. The *Draft General Management Plan* does not contemplate the construction and airlifting of any replacement historic structures. The National Park Service *Management Policies 2006* address this directly: "No matter how well conceived or executed, reconstructions are contemporary interpretations

of the past rather than authentic survivals from it." (5.3.5.4.4. Reconstruction of Missing Structures). The National Park Service will not reconstruct missing structures unless a host of criteria are met including approval by the Director.

Maintenance of historic resources is not precluded by *Olympic Park Associates v. Mainella*. The lesson of *Olympic Park Associates v. Mainella* is that cultural resource management activities must be informed by the status of the land as wilderness. This does not mean a historic feature must be allowed to decay. It does mean that cultural resources inside Olympic National Park wilderness will be managed using methods that are consistent with the preservation of wilderness character and values. Olympic National Park acknowledges that wilderness designation requires "a different perspective on the land" and is committed to balanced stewardship of cultural resources in a wilderness setting.

The *Draft General Management Plan* has been modified to more clearly reflect the evolving state of law in this area, and NPS *Management Policies 2006* (6.3.8) has been added to page 31 of the final plan reflecting this evolution. Laws pertaining to historic preservation remain applicable within wilderness but must generally be administered to preserve the area's wilderness character. 16 USC 1133(a) (3). The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analyses and decision making concerning cultural resources, including appropriate environmental compliance with opportunities for public involvement.

Comment: A federal judge rebuked Superintendent Laitner and Regional Director Jarvis for degrading wilderness character for the sake of preserving the historic scene, by attempting to install two new structures.

Response: National Park Service officials in consultation with others applied the Wilderness Act's savings clause to "save" or retain the National Park Service authority under the National Historic Preservation Act. The June 28, 2006 determination of legal fees from the U.S. District Court in *Olympic Park Associates v. Mainella* stated that: "[t]his case brought into conflict the values of historic preservation and wilderness preservation, which was a matter of first impression and one that created difficult questions. The United States reasonably attempted to harmonize the competing interests and legal authorities. The task was not an easy one.

The United States was reasonably justified in its position...”

Comment: In the 2005 decision, the court pointed out that the National Historic Preservation Act does not require physical maintenance and retention of historic structures; it only requires that the historical value of such structures be recorded. Olympic National Park was classified as a national park, not as a national historic site. And, as the 2005 court ruling notes, the wilderness classification places an additional new overlay on the landscape and the values that National Park Service is obligated to preserve at Olympic National Park and Wilderness. Old pioneer structures and “historic landscapes” are not on an equal footing in terms of National Park Service’ statutory obligations at Olympic National Park, and have no primacy over National Park Service’ obligation to preserve the natural environment and wilderness character of the area.

Response: The position of the National Park Service was not that the National Historic Preservation Act “required” maintenance and retention of historic structures, but that the National Historic Preservation Act “authorized” activities. The plan has been modified to reflect recent case law and new National Park Service policy that historic preservation decisions in wilderness areas are to affirmatively consider the preservation of the area’s wilderness character, as stated in *NPS Management Policies 2006* (6.3.8).

Comment: *The General Management Plan* takes the extreme position that cultural resource programs automatically trump wilderness mandates. The *General Management Plan* only allows that when the National Park Service carries out the cultural resource program, the National Park Service will use “methods that are consistent with the preservation of wilderness character...” (Page 26). But the *General Management Plan* presumes that the cultural resource program itself takes precedence over wilderness character.

Response: *The Draft General Management Plan* and National Park Service policy do not place the management of cultural resources above the preservation of wilderness character. Consistent with the intent of the Wilderness Act, and in accordance with *NPS Management Policies 2006*, the laws pertaining to historic preservation also remain applicable within wilderness but must generally be administered to preserve the area’s wilderness

character. 16 USC 1133(a)(3). The final plan has been modified on pages 31-32, 52-53, 147, 149, and 196 to reflect the language in *NPS Management Policies 2006* (6.3.8).

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

Comment: For the *General Management Plan* to decree that some fifty structures and eight “historic landscapes” will be maintained in wilderness in a forthcoming wilderness management plan without addressing necessity (under the Wilderness Act) of their impacts on wilderness character, is contrary to the Wilderness Act, National Park Service policies, and the scope of this plan.

Response: Laws pertaining to historic preservation remain applicable in wilderness but must generally be administered to preserve the area’s wilderness character (*NPS Management Policies 2006*, 6.3.8). The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analysis and decision making concerning cultural resources.

The methods and assumptions for the analysis of wilderness values were detailed on pages 189-190 of the *Draft General Management Plan*. As stated in the plan, the analyses in the *Draft General Management Plan* of the potential effects on wilderness resources included wilderness resource values that are considered a component of the wilderness character, including naturalness, wilderness experiences and opportunities for solitude, and opportunities for primitive, unconfined recreation. The methods and assumptions were generated after consultations with wilderness specialists from Olympic National Park, Denver Service Center, Pacific West Regional Office and the Washington Office, along with NEPA experts. Other wilderness resources, such as soundscape, visitor access, and natural resources were evaluated separately in the *Draft General Management Plan*. Generally, the impacts on wilderness character can only be subjectively determined by the visitor’s experience,

which varies greatly depending on the type of visitor and their expectations.

The Park Service included an adequate analysis of the impacts to wilderness values, including wilderness character, on pages 210-212, 247-249, 285-288, and 322-324. As stated on page 177, because the *Draft General Management Plan* is a programmatic document that does not delve into specific management techniques or methods, the level of analyses are more general in nature. If and when specific developments or other actions are proposed subsequent to the *Draft General Management Plan*, appropriate detailed environmental and cultural compliance documentation will be prepared in accord with NEPA and National Historic Preservation Act requirements, considering applicable laws and policies, including the Wilderness Act.

Comment: PEER does not advocate the removal of historical structures from Olympic wilderness; PEER does not advocate that the National Park Service cease maintenance or preservation of existing structures. PEER advocates that the *General Management Plan* make clear that the National Park Service will not develop, and thus destroy, the historic state of such structures in wilderness. Such an action would contravene the Wilderness Act. Note as well, that some of the historic structures in wilderness (ranger stations, fire lookouts, etc.) are National Park Service administrative facilities that may also be justified not only by their historical worth but as necessary for administration of the wilderness area.

Response: The National Park Service is in general agreement with these statements. We have updated our language on pages 31, 32, and 35 in the final plan to clarify these points.

Comment: All statements concerning historic and cultural resources in wilderness should be deleted from the current document and substitute instead the statement: "Historic and cultural resources within wilderness will be administered in keeping with the park's approved cultural resources management program and the additional requirements of the Wilderness Act."

Response: The final plan has been modified on pages 31-32, 52-53, 147, 149, and 196 to more clearly reflect law and policy. Laws pertaining to historic preservation remain applicable within

wilderness but must generally be administered to preserve the area's wilderness character.

Comment: The *Draft General Management Plan* does not argue for shelters as administratively necessary for protecting park wilderness. The *Draft General Management Plan* lists "shelters" among the "historic properties in the park" (p. 118). As "historic structures," shelters may remain in wilderness and the National Park Service may maintain them.

Response: Existing shelters are considered "historic" because they have been evaluated using the National Register of Historic Places "Criteria for Evaluation" (36 CFR 60.4) and meet this criteria. Twenty-two shelters are included on the List of Classified Structures and are either listed in or eligible for listing in the National Register of Historic Places. One shelter (Toleak) was determined ineligible but will be managed as a resource. Appendix E has been updated to reflect the most current information at the time of publication of the *Final Environmental Impact Statement*.

As stated previously, cultural resources that have been included within wilderness will be protected and maintained according to the pertinent laws and policies governing cultural resources and wilderness, using management methods that are consistent with the preservation of wilderness character and values. The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analyses and decision-making concerning cultural resources (NPS *Management Policies 2006*, 6.3.8).

Comment: There are reasons to maintain the trail system and historic structures. They are historic resources and should be preserved.

Response: Laws pertaining to historic preservation remain applicable in wilderness but must generally be administered to preserve the area's wilderness character (NPS *Management Policies 2006*, 6.3.8). The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analysis and decision making concerning cultural resources.

Desired Conditions in Wilderness

Comment: Under “Wilderness” add, “work closely with natural soundscape and natural quiet management.”

Response: This list is not all inclusive and through the development of the wilderness management plan, additional strategies will be included.

Comments: Under “Wilderness” and “Desired Conditions” add “absence of noise intrusions from overhead aircraft” and “aural solitude/natural quiet” to list of characteristics.

Also add, “prohibit helicopter flights at any altitude inside wilderness areas unless no other method of travel or mode of observation is possible.”

Response: Section 6(c) of the Wilderness Act prohibits the use of motorized equipment or motorboats, and no landing of aircraft unless it is necessary to meet minimum requirements for the administration of the area for the purpose of the Wilderness Act. In addition, NPS *Management Policies 2006* (6.3.5) directs that administrative use of motorized equipment or mechanical transport will be authorized only if it is the minimum requirement needed by management to achieve the purposes of the area as wilderness, including the preservation of wilderness character and values; or in emergency situations involving the health or safety of persons within the area. Current wilderness regulations and policies for use of minimum tool apply to all activities within wilderness. The *Draft General Management Plan*, page 77-78 addresses this, along with desired conditions on page 26.

Environmental Consequences in Wilderness

Comment: Impacts on wilderness character must be fully explored.

Response: Impacts on the wilderness character are fully explored in the *Draft General Management Plan*. On pages 189 to 190, the methodology and assumptions for impact analysis for wilderness values is detailed. These definitions were developed by wilderness and compliance specialists at the park, region, Denver Service Center, and Washington Office levels.

The Park Service included an adequate analysis of the impacts to wilderness values, including

wilderness character, on pages 210-212, 247-249, 285-288, and 322-324. As stated on page 177, because the *Draft General Management Plan* is a programmatic document that does not delve into specific management techniques or methods, the level of analyses is more general in nature. If and when specific developments or other actions are proposed subsequent to the *Draft General Management Plan*, appropriate detailed environmental and cultural compliance documentation will be prepared in accord with NEPA and NHPA requirements, considering applicable laws and policies, including the Wilderness Act.

Future Implementation Plans — Wilderness Management Plan

Comments: Defer all decisions related to wilderness until a comprehensive wilderness management plan is completed and available for public review

The *General Management Plan* seems to be attempting to make up for the park’s lack of wilderness management plan by frontloading several controversial decisions that deserve full discussion of rationale and impacts in the current plan.

Response: NPS *Management Policies 2006* (2.2 and 2.3) outlines that a logical, trackable rationale for park decisions is to be created through several levels of planning that are complementary and increasingly detailed. The basic foundational level is general management planning; the general management plan presents the first phase of tiered planning and decision making (see *Draft General Management Plan*, pgs 3 and 4). Implementation planning represents another tier, addressing more detailed management. A wilderness management plan is an example of an implementation plan.

The general management plan establishes the foundation for the wilderness management plan by setting the general framework for park wilderness management and providing the guide for the more detailed wilderness planning to follow in the wilderness management plan.

Decisions are made in the *General Management Plan* related to overall policies and mandates, desired conditions, and some initial strategies for wilderness (page 26-27). It also establishes basic

zoning in wilderness and may address more complex wilderness issues. This is all in accordance with National Park Service policies and planning guidelines (DO-2). Olympic National Park's wilderness management plan will be built on and initiated after the general management plan is complete and will guide preservation, management, and use of wilderness resources.

Comment: On page 26, the *General Management Plan* states that park staff will develop a wilderness management plan, but on pages 37-39 where there is a discussion of planning efforts and planning documents there is no mention of developing a wilderness management plan. When would this plan be initiated?

Response: Preparation of a wilderness management plan is discussed on page 81 of the *Draft General Management Plan*, under "Future Studies and Implementation Plans Needed." The wilderness management plan will be initiated after completion of the *Final General Management Plan*.

"Relationship of Other Planning Efforts to this General Management Plan" (pgs 37-39) includes approved plans that influenced the general management plan's preparation. The wilderness management plan is not mentioned here, as it is not as yet developed.

Comments: No wilderness management plan was completed, yet numerous controversial decisions about wilderness, such as maintaining and restoring between 29 and 50 historic structures in designated wilderness, are included.

No significant management actions affecting cultural resources within wilderness, except those needed in emergency situations, should be conducted until the Park Service has completed both the approved cultural resource plan and a comprehensive wilderness stewardship plan to ensure the proper coordination, consistency, and continuity of these two important programs.

Response: As stated on page 81 of the *Draft General Management Plan*, the Park Service agrees that the preparation of a wilderness management plan is a top priority for the park after completion of the general management plan. The wilderness plan will address the historic preservation of cultural resources in wilderness and will provide more details on how cultural resources will be managed. The National Park Service does not agree that no

significant management actions affecting cultural resources within wilderness will be taken until a wilderness plan is completed, but the National Park Service will be adhering to new law and policy in any decisions that are made in the interim. Laws pertaining to historic preservation remain applicable in wilderness but must generally be administered to preserve the area's wilderness character (NPS *Management Policies 2006*, 6.3.8). The responsible decision maker will include appropriate consideration of the application of the provisions of the Wilderness Act in analysis and decision making concerning cultural resources.

In accordance with NPS *Management Policies 2006* (6.3.5), all management decisions affecting wilderness will be consistent with the minimum requirements concept. This concept is a documented process used to determine if actions undertaken by the National Park Service that could affect wilderness character, resources, or the visitor experience are necessary, and if so, how to minimize impacts. This process ensures the proper coordination, consistency, and continuity of wilderness and cultural resources management until a wilderness management plan is developed. As stated on page 81, a wilderness management plan will be initiated after the completion of the final general management plan to address the specific management strategies for Olympic National Park wilderness.

Potential Wilderness Areas

Comment: The plan should address the status of potential wilderness areas.

Response: The historic Olympic Hot Springs campground is a potential wilderness addition, and alternatives are included in the *Draft General Management Plan* for addressing the area (pages M9-12). The wilderness management plan will address the remaining potential wilderness additions, identifying the current nonconforming uses and, in areas where action might be taken to restore wilderness, developing general proposals.

Eligibility Studies and Wilderness Additions

Comment: Include Pyramid Peak Ridge wilderness suitability study in the preferred alternative.

Response: Page M16, the Lake Crescent alternative D, the preferred alternative, does include a wilderness eligibility study for this area.

Comment: The controversy over maintaining historic trail shelters and controlled burn at Lake Ozette is evidence that adding more wilderness areas is counterproductive. Adding wilderness areas to the park diminishes the historical areas and public access while merely increasing the size of the park.

Response: National Park Service policy calls for the balanced approach to managing historic properties in wilderness. Following this policy should provide full protection for cultural resources within a wilderness.

Cultural resources that have been included within wilderness will be protected and maintained according to the pertinent laws and policies governing cultural resources using management methods that are consistent with the preservation of wilderness character and values.

Comment: How can an area be considered wilderness-compatible when there are permanent structures in place?

Response: The Wilderness Act defines wilderness as “undeveloped federal land retaining its primeval character and influence, without permanent improvements.” Section 6(c) of the Wilderness Act prohibits structures or installations within wilderness, unless they are necessary to meet minimum requirements for the administration of the area for the purpose of the Wilderness Act. NPS *Management Policies 2006* (6.3.10) interprets this to mean that authorization of administrative facilities located in wilderness are to be limited to the types and minimum number essential to meet the minimum requirements for the administration of the wilderness area.

Comments: Why are Ozette Lake and the Ozette area the only wilderness studies being considered? Have all other nonwilderness areas of Olympic National Park received this assessment?

Why is a wilderness suitability study proposed for Lake Ozette?

Response: All lands (and waters) acquired after July 1974 need to be evaluated for wilderness eligibility in accordance with NPS *Management Policies 2006*

(6.2.1). In addition, lands not previously evaluated, such as the area north of Lake Crescent, need to be evaluated.

National Park Service *Management Policies 2006* (6.2.1) also states that where a nonconforming use has been terminated or removed, a reevaluation of eligibility must be conducted. In 1974, the now closed portion of the Boulder Creek road was deemed not suitable for wilderness because it was a road. Given its subsequent closure to vehicles and its proposed restoration, it will need to be reevaluated for wilderness eligibility. The text has been updated in the final plan under “Alternatives” to reflect this policy.

Comment: Much of the land within the proposed boundary adjustment of 12,000 acres in the proposed boundary adjustment at Lake Ozette has already been cut and continues to be clear-cut and would thus be inappropriate for wilderness designation.

Response: Lands may be currently ineligible for wilderness designation, but if boundaries were adjusted, active restoration will occur and over time, the lands could eventually be eligible for wilderness designation. In accordance with NPS *Management Policies 2006*, all newly acquired lands or lands not previously evaluated are to be evaluated for wilderness eligibility (6.2.1).

Comment: The “wilderness mandate” of Olympic National Park will eliminate active fish and wildlife habitat and water quality activities that are now and will continue to be done under the State of Washington legislation. The Olympic National Park preservation ethic conflicts with the Society of American Foresters conservation ethic and restricts our ability to ensure the continued health and use of the forest ecosystem

Response: The commenter is incorrect. The goal of the Park Service under the resultant boundary adjustment is to create an area of protection around the lakeshore that is not suitable for forest land manipulation and harvest management practices. It will not preclude the Park Service from implementing fisheries or other restoration projects.

If Ozette Lake or any lands acquired through the willing seller process are determined eligible for wilderness designation, and if legislation subsequently designates wilderness, management

activities will be required to follow the minimum requirement concept, but restoration and fisheries protection activities will not be precluded.

Comment: Will the intent of the administrative section (3) of the 1988 legislation be applied to any intended wilderness designation (refers to buffers). How will the National Park Service manage and take care of landowner needs if the wilderness designation comes up to the doorsteps of the landowner?

Response: The administrative section (b)(3) referenced by the commenter, referring to protective perimeters or buffer zones adjacent to wilderness, appears in H.R. 4146. It is not in the final language of Public Law 100-668, the Washington Park Wilderness Act of 1988, and therefore is not legally applicable to current or future lands adjacent to the Olympic Wilderness. NPS *Management Policies 2006* (6.3.4.1) states that "Transition zones adjacent to wilderness may be identified to help protect wilderness values, but no transitional or "buffer" zones are appropriate within wilderness boundaries."

Federal law generally provides for landowner access to property, including those instances when wilderness is immediately adjacent to private lands. All valid existing private rights remain with wilderness designation. National Park Service *Management Policies 2006* (6.4.6) reaffirms this: "Wilderness designation does not extinguish valid existing private rights. Valid private rights in wilderness are to be administered in keeping with the specific conditions and requirements of the valid right." This information has been clarified in the final plan and alternative D has been modified to reflect access rights.

Comment: Will the wilderness assessment study of the lake satisfy the implied need once and for all, or will we continue to be plagued by this type of assessment for years to come?

Response: National Park Service *Management Policies 2006* (6.2.1) state that lands originally assessed as ineligible for wilderness because of nonconforming or incompatible uses must be reevaluated if the nonconforming uses no longer exist.

Comment: The land north of the Spruce Railroad Trail in no way qualifies for wilderness designation. There are roads, private homes, and a resort in

addition to recreational activities north of the Spruce trail in the Lyre River area cove.

Response: The area proposed to be studied for wilderness eligibility does not include the trail or the lakeshore, or the Lyre River area cove.

Trails and Wilderness

Comment: No new trails have been created in years. Why isn't more money allocated for trails?

Response: In recent years, trail-related funding has been directed towards maintaining and repairing the existing 600 miles of trails within the park.

The *Draft General Management Plan* examined the question, "To what extent can there be public road and trail access to visitor destinations while minimizing or mitigating impacts on natural processes or park resources?" (page 41.) Several alternatives were considered within the plan and alternative C included increasing the number of trails (page 67). Under the preferred alternative (page 68) trails will be kept at approximately their current levels. Some frontcountry trails will be modified for universal accessibility.

Comment: Keep wilderness trails narrow; minimize construction and relocation of wilderness trails except where needed to protect resources. Maintain existing trail bridges and boardwalks

Response: Desired Conditions for the park (pg 33) state that "Roads, trails and related facilities are provided, but locations and numbers may be modified for resource protection, restoration, visitor experience, or increased visitation." Under the preferred alternative trails are kept at approximately their current levels (page 68) but might be modified for resource protection, restoration, or visitor experience, or to address increased visitation.

More detailed discussion of wilderness trails will be included in the wilderness management plan, to be initiated after the completion of this general management plan.

Comment: How would the trails change within the general management plan?

Response: The general management plan provides the framework to establish what trail types will be

found in each wilderness zone and does not change the trail status from current conditions.

Through the public involvement activities of the wilderness management plan process we will seek input on where wilderness zones should be designated and what trail classification should be assigned to all park trails.

Comment: Let's call all trails "trails," not "paths" and "routes" when you are meaning to suggest that they are sketchy or undesirable. The term "social trail" is okay. A "way trail" is a trail caused by people going the same way over and over again, with no particular plan. It is the opposite of an engineered trail, one that was laid out and built rationally. Don't call it a "way trail" if it is an engineered trail that has not been maintained.

Response: The *Draft General Management Plan* glossary (pg 392) includes definitions for the park's maintained trail types: Nature Trails, All Purpose Trails, Multipurpose Bicycle Trails, Secondary Trails, Foot Trails, and Primitive Trails. Travel routes that are recognized but are not a part of the maintained trail system include Way Trails, Social Trails, Routes, and Beach Routes/Travelways. Definitions for these types of trails have been added to the glossary.

Visitor Use and Wilderness

Comment: What is the social carrying capacity of certain areas of the park and what must be done to enhance or maintain the "wilderness" park experience? The *General Management Plan* avoids any quantitative discussion of "carrying capacity" or "user capacity," a method of attempting to quantify or qualify the impacts of overuse of a resource. In the context of the "wilderness character" of the park, there should be detailed discussion of the effects of overcrowding by visitors and the effects on the wilderness experience.

Response: This level of detail will be included in the wilderness management plan, which will be initiated following the completion of the general management plan.

Comment: It is unclear if backpacking would be allowed to continue in the coastal strip of the park.

Response: Backpacking will continue to be permitted on the coastal strip of Olympic National

Park (Table 2 of the final plan). However, overnight camping may be limited in certain areas, such as within the intertidal reserve zones. More detailed information on wilderness use on the coast of the park will be included in the wilderness management plan, to be initiated after the completion of this general management plan.

Comment: Establish quotas in certain backpacking areas (Sand Point, Seven Lakes Basin, Flap Jack Lakes for example).

Response: Overnight use limits or quotas are already in effect in a number of the park's wilderness camping areas, as specified in the "Superintendent's Compendium."

More detailed planning for the management of wilderness use will be included in the wilderness management plan, which will be initiated after the completion of this general management plan.

Comment: Page M12 notes that the "former historic Civilian Conservation Corps campground at Olympic Hot Springs would be rehabilitated with some sites removed." We are concerned that the removal of camping sites within that historic property would reduce access to campers, while also altering a historic property that the *General Management Plan* indicates the National Park Service wants to protect.

Response: The commenter correctly notes that the *Draft General Management Plan* preferred alternative calls for some sites at the former Civilian Conservation Corps campground to be removed and restored to natural conditions. However, this alternative further notes that "other sites would be retained to allow continued camping opportunities for backpackers" (page M12).

Park staff will work with the State Historic Preservation Office as required to ensure that campsite removal and restoration will not affect the historic integrity of the campground.

Wilderness Zoning

Comments: Why are there three wilderness zones in the *General Management Plan*? As far as I can read, there is only one Wilderness Act and that is the only one you should be following.

We strongly object to the proposal to designate use levels of wilderness areas without providing specific reasons.

A 1938 speech that wilderness preservation is primary management objective supports the need to limit or eliminate air tours and ask the Federal Aviation Administration to designate Olympic National Park a no-flight zone to all aircraft for the purposes of natural quiet preservation as key component of Olympic Park's backcountry wilderness.

To zone the Olympic Wilderness into use zones, including some 500 miles of trails, campgrounds, primitive trails, and cross-country routes, without providing any detail or specific rationale is clearly beyond the scope of the present plan.

The management zone concept on page 57 describes 3 wilderness zones. This is unnecessary. Wilderness is wilderness. The attempt to classify this into the wilderness trail zone, primitive wilderness zone and primeval wilderness zone appears to be a veiled attempt to administratively change the definition of wilderness as defined in the federal act with the intention of gradually making the backcountry less available to the public. The subsequent use of wilderness zones in the various alternatives to restrict public access is in direct opposition to the purpose and mission of Olympic National Park. It also is in conflict with the 1938 Olympic National Park enabling language.

Response: National Park Service *Management Policies 2006* (2.3.1.3) directs that a park's general management plan will include delineation of management zones. The management zones reflect differences in intended resource conditions, visitor experience, and management activity for specific areas of the park (pages 57-61). National Park Service *Management Policies 2006* (6.3.4.1) states that all categories of wilderness may be zoned for visitor experiences and resource conditions consistent with their wilderness values within the established management zoning system for each park. However, management zoning "cannot, and will not, diminish or reduce the maximum protection to be afforded lands with wilderness values."

Three wilderness zones have been proposed in the *Draft General Management Plan* to reflect a range in desired conditions for the wilderness, allowing higher levels of use and impact in some areas and

lower levels of use and impact in others. Each zone meets the spirit of the Wilderness Act, the 1988 Washington Park Wilderness Act, minimum tool requirements, and other applicable laws, policies, and guidance.

The wilderness zones proposed within the *General Management Plan* allow the Park Service to define long-term management options in the wilderness. For example, in the primeval zone, there would be no managed trails, no or few visitor services, and no designated campgrounds (Table 2 of the final plan). These zones provide the foundation for the development of the wilderness management plan. Specific designations of zones and, potentially, subzones, would occur within the framework of the wilderness management plan.

Comment: Buffer zones of 100-200 feet between roads and wilderness should be more aptly called visual buffer zone. This short distance does little to attenuate noise levels that intrude far into wilderness areas.

Response: The 100- to 200-foot distances described in the *Draft General Management Plan* (pg 118) define the distances from road center to the wilderness boundary. This frontcountry road corridor provides an area within which road maintenance and minor road reroutes may occur. Though in many cases the corridor does provide a visual transition zone and a less effective auditory transition zone between road and wilderness, its primary purpose is not as a buffer.

WILDLIFE

Comment: We recommend that "Reintroduce extirpated species" be added to mitigative measures and the restoration of extirpated species becomes a desired condition for the future of the park.

The plan should call for the restoration of all extirpated species.

Response: Desired conditions for native species were clarified in the final plan to recognize that restoring extirpated species is consistent with National Park Service policies and Olympic National Park goals. A plan to restore any extirpated species will be subject to analysis through an environmental assessment or environmental impact statement and public participation will be invited.

Comment: Decreased logging would drive the elk further out of their homes, as they need open areas for grazing.

Response: Most of the lands in the proposed Olympic National Park boundary expansion areas have been harvested and are at various stages of forest succession. In early forest successional stages (about 5-15 years after timber harvest), there are large amounts of herbaceous and shrub forage that support herds of elk and deer.

However the mid-stage of succession, which occurs approximately 20-40 years after harvest (and is often called stem exclusion or closed canopy stage), has little to no vegetation in the under or mid-story, and does not support many wildlife species, including deer and elk.

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

However, mature forest stands, including old-growth forest, provide key foraging resources for deer and elk year-round on the Olympic Peninsula.

Comment: Your discussion of nonnative species is wholly lacking in direction for any nonnative wildlife. The Park Service has a recognized mandate to manage nonnative populations and where appropriate, remove them. This issue requires a much fuller discussion in the final Environmental Impact Statement.

Response: In accordance with NPS *Management Policies 2006*, the National Park Service manages populations of exotic plant and animal species, up to and including eradication, wherever such species threaten park resources or public health and when control is prudent and feasible (4.4.4).

The intent of the general management plan is to set broad desired conditions and the framework for future management of park resources and not to develop implementation level plans. As stated on page 81, (paragraph four) of the *Draft General Management Plan*, future studies and implementation plans will include program plans to examine the future management direction for

wildlife, fish, exotics, and nuisance animals within the park.

Comments: Mountain goats are a stately attraction and add to the wilderness experience. I have heard some very disturbing accounts of the cruel and inhumane treatment afforded to the goats the last time the Park Service engaged in [removal] operations.

Leave the mountain goats alone. They are historical and an interesting attraction. They can easily be controlled by proper placement of mineral blocks. They do not damage rare plants. Piper harebell, to name one species, usually grows in rock crevasses and cliff sides and plenty would be inaccessible to the goats. The Olympic Mountain Timothy is an annual and reseeds easily.

Response: A scientific review completed in 2000 by the Conservation Biology Institute concluded that "...the preponderance of evidence supports the view that the mountain goat has never been native to the Olympic Peninsula" (Noss, et al. 2000). National Park Service *Management Policies 2006* (4.4.4.2) directs park managers to manage nonnative species when control is prudent and feasible, and the species "interferes with natural processes and the perpetuation of natural features, native species or natural habitats." Mountain goats utilize rocky outcrop areas and are known to consume rare and endemic plant species that also occur in these habitats.

Placement of mineral blocks does not control mountain goat populations (Houston, et al. 1994). Any management plan for the goats will be subject to analysis through an environmental assessment or impact statement and public participation will be invited.

National Park Service biologists captured mountain goats intermittently from the late 1970s through the 1980s. Most were transferred to state wildlife departments and were released in other states. The welfare and careful treatment of the animals was a critical consideration in each capture operation.

Comment: The plan states that mountain goats are nonnative. Based on the Quinault Nation's review of the *General Management Plan*, we believe the plan discredits the goat sightings and artifact items provided by the Nation.

Response: While we acknowledge that some disagreement may exist, a scientific review was

completed in 2000 by the Conservation Biology Institute. It concluded that, “. . . the preponderance of evidence supports the view that the mountain goat has never been native to the Olympic Peninsula,” and, “. . . given the paleoecological and environmental history of the Olympic Peninsula, our team considers the probability relatively low that goats could have colonized the Peninsula at some time in the past,” and, “Most of us consider the ethnographic evidence (as reviewed by Schalk 1993) a powerful argument for the absence of a population of mountain goats on the Peninsula prior to the introductions in the 1920s.” (See: Noss, R. F. and R. Graham, D.R. McCullough, F.L. Ramsey, J. Seavey, C. Whitlock, M.P. Williams. Review of Scientific Material Relevant to the Occurrence, Ecosystem Role, and Tested Management Options for Mountain Goats in Olympic National Park. 2000. Report to U.S. Department of Interior.)

Comment: The *General Management Plan* offers inadequate measures for recovering threatened and endangered species or at-risk wildlife species.

Response: In accordance with NPS *Management Policies 2006* and National Park Service planning guidelines, the purpose of general management plans is to ensure that the park has a clearly defined direction for resource preservation and visitor use (2.3.1). General management plans are not meant to provide specific details on threatened and endangered species recovery or plans.

The National Park Service is involved in recovery plans when appropriate, and these plans provide the detailed information on the measures necessary for species recovery. A listing of some of the recovery plans that the National Park Service is involved with can be found on page 81. Depending on the magnitude of actions required by a recovery plan, subsequent environmental analysis and public involvement may occur prior to implementing recovery actions inside the park.

OTHER COMMENTS AND MODIFICATIONS TO THE GENERAL MANAGEMENT PLAN

Comment: There is an error on page 135 on the citation of the Treaty of Olympic

Response: This has been corrected in the final plan.

Comment: There is an omission in the description of the Quileute Tribe’s jurisdiction over islands. Smaller items near James Island that are connected to the reservation during periods of low tide (because the land bridges are entirely exposed) are part of the Quileute reservation.

Response: The intention of the plan is to provide a general description of area reservations and not to address current boundary disputes or issues.

Comment: The Park Service should consider safety issues when planning what parking lots to enlarge. We found not a word about improving the Third Beach facility. Yet in the summer cars not only fill the lot but park all over the roadside and create a traffic risk.

Response: This was considered under alternative C in the *Draft General Management Plan* (pages 328, 336-347). There is no expansion considered under the preferred alternative; however, if future conditions and safety concerns warrant an expansion or reconfiguration of the parking lot at Third Beach, the Park Service would work with the Quileute Tribe to explore options.

Comment: The Park Service discusses hazard trees on page 180 but does not discuss hazard rocks.

Response: The plan has been updated in the “Environmental Consequences, Cumulative Impacts” section to include additional information on the road management system. The road management program is intended to enhance visitor experience while providing safe and efficient accommodation of park visitors and to serve essential management access needs. It requires the routine maintenance and repair of road surfaces, roadsides, bridges, culverts, and ditches. Road maintenance also includes the placement and maintenance of roadside signs, road surface sanding and sweeping, the removal of obstructions or safety hazards (e.g. rocks and trees), and the removal of snow from the Hurricane Ridge Road.

Comment: There is little mention of tsunami risk to visitors and protection from this hazard. There should be discussion of what might happen at Rialto Beach, There should be signs, visitor advice, and directions.

Response: As we develop new visitor information kiosks, we will include information on tsunami risks. In addition, evacuation route signs are now in place. This level of specificity is not appropriate for

general management plans; however, we will continue to work with park partners and neighbors, including area tribes, to educate visitors about tsunami risks.

Comment: The lack of availability of cedar logs of suitable size has forced tribes to be unable to build traditional dugout canoes for twenty years. The traditional skills that are handed down generation to generation may be lost soon. The park has a multitude of suitable sized trees and should make one available for the use of the tribe.

Response: Any trees that fall within park developed areas or on roadways are assessed to determine if they could be used by area tribes. Unfortunately, not many suitable trees of appropriate size are found.

Comment: The park land that borders the southern and southeastern edges of the Hoh reservation should not be designated wilderness.

Response: Wilderness was designated in 1988 through a public process and there are no proposals to seek to remove the designation of wilderness south of the Hoh Reservation. Lands due east of the reservation are not designated wilderness.

Comment: Table 5 lists the Quinault River as "non-glacial" which is incorrect. The east fork is glacial and the north fork is nonglacial.

Response: We have changed table 5 with the corrections: East Fork is glacial; North Fork is not glacial.

Comment: The Olympic mudminnow, the Olympic torrent salamander, and the jumping slug are present outside of Olympic National Park.

Response: We have corrected this text in the final plan.

Comment: The related element is the recent US District Court decision regarding the Federal Regulatory Commission / Tacoma Power Cushman Project #460. The Court identified, in an August 18th 2006 decision, its support of certain improvements to the watershed conditions. The Department of Interior 4(e) conditions include supporting flow regime modifications, and fish passage past the two Cushman dams, in addition to other critical watershed enhancements. The implementation of these 4(e) conditions has long been a goal of supporting restoration of full

watershed integrity in its entirety, from the Skokomish estuary and delta to the headwaters of all basin tributaries. Such access includes passage past the dams that block the salmonids' ability to exhibit their anadromous characteristics. Such blockages have violated the Federal Power Act for 70+ years. Along with the out-of-basin diversion of the North Fork Skokomish, the fisheries and associated habitat have been deleteriously affected, challenging the treaty rights of the Tribe.

Response: The Department of the Interior proposed conditions for the protection and utilization of the Skokomish Indian Reservation pursuant to section 4(e) of the Federal Power Act. A recent appellate court recently determined that the Federal Energy Regulatory Commission erred in rejecting the Interior's conditions and remanded the matter to the Commission for further proceedings for including the conditions in the license. Olympic National Park supports these conditions as we believe that some of the fisheries measures will benefit park resources and tribal trust resources.

Comment: We encourage the Park Service to consider limited access for non-Tribal harvest of elk through a permitting process. The permitting process would allow an opportunity for education on Tribal culture and harvest management.

Response: Hunting is not permitted in the park in accordance with the enabling legislation for the park and regulated by 36 CFR Sections 2 and 3.

We do agree, however, that it is important to educate the public on Treaty-reserved harvest and tribal culture. As stated previously, the *Draft General Management Plan* identifies the need to expand the number and variety of education programs (page 148), the desired condition that education programs are available, and that one of the strategies to accomplish this desired condition is coordinating education programs with partners and focusing on improving the general understanding of park cultural resources (page 33). Working in partnership with the Quinault Nation to expand what is currently offered will contribute to the accomplishment of this desired condition. This can be done a number of different ways, and the park staff will work with the tribes to determine appropriate strategies. Olympic National Park is committed to improving its government-to-government relationship and avoiding impairment of treaty-protected rights.

COMMENT LETTERS

The following section shows reproductions of the comment letters from federal, state, and local governments; Indian tribes; interest groups and organizations; and businesses that provided comments on the draft plan. Due to the extensive number of comment letters, comment letters from

private citizens are not included in this final volume. Copies of all letters are available in electronic format, with individual names and addresses removed, and are available upon request. The responses to these letters are shown in the previous section.

