

National Park Service  
Department of the Interior

Olympic National Park  
Washington



# Mountain Goat Management Plan and Environmental Impact Statement

Olympic National Park

***Public Scoping Comment Analysis Report***

January 2015

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## INTRODUCTION

Public scoping is the process by which the National Park Service (NPS) solicits public input on the scope of issues and alternatives to be addressed in a National Environmental Policy Act (NEPA) document, such as an environmental impact statement (EIS). The process is open to the general public and is conducted early in the NEPA planning process. Public scoping can include meetings and mailings to educate the public on the project and on the planning process guiding the preparation of an EIS. It also instructs the public on how to provide comments on the project. After the public scoping period ends, the National Park Service uses an established protocol to analyze and summarize the public comments received during the scoping period. The National Park Service uses this summary—in addition to other relevant law, policy, planning documents, and scientific literature—to determine the scope of the environmental impact statement.

### PUBLIC SCOPING FOR THE MOUNTAIN GOAT MANAGEMENT PLAN/ EIS

Olympic National Park (the park) held a public scoping period for the Mountain Goat Management Plan/Environmental Impact Statement (plan/EIS) from during the summer of 2014. During this time, three open house meetings were held at different locations in the vicinity of the park. The public was encouraged to submit comments through the NPS's Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov/olyngoat>). The PEPC system is a database that the NPS uses to receive, analyze and summarize public scoping comments. Comments were also accepted at the meetings, by postal mail, and in person at the park. This report describes the public scoping process for this plan/EIS and presents the analysis and summary of public comments received.

The public scoping period was open for a total of 60 days between July 21, 2014, and September 19, 2014. The NPS issued a press release to 165 media outlets, interested groups, and interested individuals on July 21, 2014, announcing the dates, times, and places of the public scoping meetings. The public comment period for initial scoping was opened on July 21, 2014. On July 22, 2014, the NPS sent a scoping letter to 101 interested individuals and organizations notifying them of the opportunity to comment, and the NPS PEPC website was activated for the public to submit comments.

Three public scoping open houses were held during the comment period at the following locations:

- August 11, 2014: Seattle Public Library, Seattle, Washington
- August 12, 2014: Olympic National Forest Headquarters, Olympia, Washington
- August 13, 2014: Port Angeles Public Library, Port Angeles, Washington

A total of 55 people attended the three meetings (10 people attended the meeting in Seattle, 5 people attended the meeting in Olympia, and 40 people attended the meeting in Port Angeles).

At each meeting, the NPS provided handouts (see Appendix B) that included information about the background of the project, the proposed purpose and need, the proposed plan objectives, the preliminary alternative concepts, the NEPA process, and information on how to comment, including directing comments to the NPS PEPC website. This information was also displayed on boards at each meeting venue. Park staff were available to answer questions and provide additional information to open house attendees.

A writing station was provided at each meeting where attendees could sit, write down their comments, and submit the comment form directly. Attendees also were welcome to submit any written comments

they had brought with them into the provided boxes. Comment forms could also be taken home and mailed later.

Approximately two weeks prior to the end of the comment period (on September 18, 2014), the National Park Service issued a second press release to 169 media outlets, interested groups, and interested individuals reminding the public of the opportunity to review the preliminary draft documents and to provide comments and suggestions.

During the scoping period, nearly 100 pieces of correspondence were received. All pieces of correspondence received are included in Appendix A.

## DEFINITION OF TERMS

Primary terms used in the document are defined below.

**Correspondence:** A correspondence is the entire document received from a commenter. This includes letters; written comment forms; comments entered directly into PEPC; and any other written comments provided either at the public scoping meetings, by postal mail, or in person at the park.

**Comment:** A comment is a portion of the text within a correspondence that addresses a single subject. It could include information such as an expression of support or opposition for an alternative, additional data regarding the existing condition, or suggestions for impact topics to be considered.

**Code:** A code is a grouping centered on a common subject. The codes were developed during the scoping process and are used to track major subjects.

**Concern:** Concerns are statements that summarize the issues identified by each code. Each code was further characterized by concern statements to provide a better focus on the content of comments. Some codes required multiple concern statements, while others did not. In cases where no comments were received on an issue, the code was not identified and it is not discussed in this report.

**Quotes:** Representative quotes have been taken directly from the text of the comments received from the public and further clarify the concern statements. Quotes have not been edited for grammar.

## COMMENT ANALYSIS METHODOLOGY

Correspondence includes hard copy letters via postal mail or delivered in person at the park, comment sheets submitted at the public meetings, or correspondence entered directly into the internet-based PEPC system. Letters received by email, through the postal mail, or submitted in person at the park, as well as the comments received from the public meetings, were entered into the PEPC system for analysis.

Once all the correspondence was entered into PEPC, each was read, and specific comments within each unique correspondence were identified. Nearly 300 comments were derived from the correspondence received. When identifying comments, every attempt was made to capture the full breadth of comments submitted.

To categorize comments, each comment was given a code to identify the general content of a comment and to group similar comments. A total of 25 codes were used to categorize all of the public scoping comments received. An example of a code category developed for this project is *Impact Topic: Vegetation*. In some cases, the same comment may be categorized under more than one code category,

reflecting the fact that the comment may contain more than one issue or idea. It should be noted that the impact topics brought up in the public scoping comments are unlikely to be the only topics considered in the plan/EIS. Impact topics to be considered in the plan/EIS are informed not only by the public comments but also by a number of other influences.

## GUIDE TO THIS REPORT

This report is organized as described below. The *Content Analysis Report* and the *Concern Statement Report* are provided in the following sections of this document. The full list of correspondence and the handout provided during the public scoping process are provided as the appendices.

**Content Analysis Report:** This is the basic report produced from PEPC that provides information on the numbers and types of comments received, organized by code and various demographics.

**Concern Statement Report:** This report summarizes the comments received during the public scoping process. In the report, comments are organized by codes and further organized into concern statements. Representative quotes are provided for each concern statement.

**Appendix A – Correspondence Report:** This report provides a complete listing of all correspondences received during the public scoping period. Commenter names and contact information have been redacted from this list.

**Appendix B – Public Scoping Handout:** This document was provided to the public at the initiation of the public scoping period and as a handout during the public scoping meetings to provide background information and preliminary project information, and to solicit public input in developing the plan/EIS.

## HOW WILL MY COMMENT BE USED?

As described above, all comments are categorized into concern statements, such as “Commenters suggested that a combination of alternatives be used to manage mountain goats in the park” and “Commenters stated that mountain goats are causing negative impacts to native vegetation.” These concerns are listed in the *Concern Statement Report* section of this document. These concerns will guide the alternatives, issues, impact topics, and references to be considered during drafting of the plan/EIS.

This report is a summary of public comments received during the public scoping period for the plan/EIS. This report, including the comments in this report, has not been screened for consistency with NPS law and policy, or for whether a particular comment is within the scope of the plan/EIS.

## CONTENT ANALYSIS REPORT

### Correspondence Distribution by State

State	Percentage	Number of Correspondence
WA	89.0 %	81
UN	2.2 %	2
VA	1.1 %	1
AZ	1.1 %	1
CO	1.1 %	1
TX	1.1 %	1
OR	1.1 %	1
CA	1.1 %	1
NJ	1.1 %	1
TN	1.1 %	1
<b>Total</b>	—	<b>91</b>

### Correspondence Distribution by Country

Country	Percentage	Number of Correspondence
USA	100.0 %	91
<b>Total</b>	—	<b>91</b>

### Correspondence Signature Count by Organization Type

Organization Type	Correspondences
Conservation/Preservation	4
Unaffiliated Individual	87
<b>Total</b>	<b>91</b>

### Correspondence Distribution by Correspondence Type

Type	Number of Correspondences
Web Form	73
Park Form	12
Letter	6
<b>Total</b>	<b>91</b>

## CONCERN STATEMENT REPORT

The following report is organized by code categories and then concern statements. Representative quotes are provided for each concern statement.

Representative quotes were taken directly from pieces of correspondence provided by the commenters. Grammar and spelling were not altered. These representative quotes were not the only comments received under a particular concern statement; rather, these quotes were chosen to represent those comments categorized under each concern statement.

### ***Preliminary Alternatives: No Action***

#### ***CONCERN STATEMENT:*** (Concern ID: 52572)

Commenters advocated for the no action alternative suggesting that the current population of mountain goats seems sustainable. One commenter stated that unless mountain goats are creating "un-natural" problems in the park, the goats should be allowed to defend their territory and humans should not interfere.

##### ***Representative Quote(s):***

**Corr. ID:** 22

**Representative Quote:** Unless the mountain goats are creating a problem un-natural to the Olympic National Park, other than "defending it's territory from intruders, accidental in nature or otherwise", then nothing should be done about them.

They are creatures living in as near normal environs as they can. Human traffic should be wise enough not to interfere with the goats or any other species capable of causing said humans harm. Humans are the interlopers and should take care NOT to interfere with natures process.

**Corr. ID:** 64

**Representative Quote:** I suggest the "No Action Alternative" for Mountain Goat management. The present population of goats seems sustainable and does not appear to be detrimental to indigenous plants. Many of the areas with a high concentration of goats were study areas where salt blocks were placed, in the past to attract goats for the studies.

#### ***CONCERN STATEMENT:*** (Concern ID: 52573)

Commenters stated that the no action alternative is not an option. They noted that current management has been proven ineffective and that the park does not have sufficient resources to make aversive conditioning an adequate alternative. One commenter indicated that a continuation of current management practices would not improve conditions related to public safety and natural resources.

##### ***Representative Quote(s):***

**Corr. ID:** 52

**Representative Quote:** The No Action Alternative will not improve the current condition in which mountains goats are threatening public and National Park Service (NPS) staff safety. Also, the No Action Alternative will unlikely provide improved natural resource conditions if current strategies of mountain goat management are continued.

**Corr. ID:** 86

**Representative Quote:** The no action alternative is the least realistic solution - the park does not have sufficient staffing to do aversive conditioning on a consistent and effective level.

**Corr. ID:** 87

**Representative Quote:** "Do nothing" has been proven wrong. Throwing rocks is not an acceptable method of goat control! I do not want to come down a trail after the three previous encounters with humans have involved rock throwing!

### ***Preliminary Alternatives: Combination of Alternative Concepts***

#### ***CONCERN STATEMENT:*** (Concern ID: 52574)

Commenters suggested that a combination of alternatives be used to manage mountain goats in the park. Potential combinations could include (1) capture and relocation combined with lethal removal of remaining animals (whose meat could be provided to local food banks or tribes); (2) relocation combined with use of immunocontraceptives; (3) some combination of public information, public education, problem animal control, relocation, and conservation of native vegetation and wildlife; (4) continuation of the no action alternative combined with increased nuisance control; and (5) a combination of relocation, lethal removal of aggressive individuals, increased nuisance control, and male neutering.

#### ***Representative Quote(s):***

**Corr. ID:** 1

**Representative Quote:** Although fraught with difficulties in the past, it would be my preference to relocate most goats in the Olympic Mountains to the Cascade Mountains, where they are native and herds in some locations (e.g., Glacier Peak) might benefit from augmentation. For those goats that can't be relocated, or if relocation isn't feasible, then they should be eliminated entirely from the Olympics by shooting them (presumably by federal wildlife officers). The resulting meat could perhaps then be provided to food banks or tribes on the peninsula. Of importance in this regard is coordination with Olympic National Forest, which of course has a sizable goat herd in the Mt. Ellinor area.

**Corr. ID:** 12

**Representative Quote:** I support relocation to the Cascades, lethal removal of aggressive individuals, and increased nuisance control. I also wonder at the possibility of neutering the males in order to stop the expansion of the herd and allow the population to die out over time.

**Corr. ID:** 52

**Representative Quote:** At this stage in the process, NPCA supports the Combination of Alternative Concepts which combines elements of the Capture and Translocation and Removal concepts. The NPS should strive to remove all exotic mountain goats from Olympic National Park and this is only possible through a combination of capture and lethal removal. Only by removing all mountain goats will natural resource conditions improve, public safety in relation to mountain goats ensured, and a long term solution reached.

**Corr. ID:** 61

**Representative Quote:** OPAS supports the relocation of the Goat population out of ONP and the Olympic Peninsula. We will support a scientific Management Plan that includes public information, education on safe human behavior in areas inhabited by Mountain Goats, problem animal control, animal relocation, and conservation & protection of native vegetation and other wildlife.

**Corr. ID:** 66

**Representative Quote:** I would support the Transfer and Relocation option or the No Action Alternative combined with the Increased Nuisance Control.

**Corr. ID:** 84

**Representative Quote:** From my view I see two reasonable sides. The first one is moving the goats to the native lands and the second one is neutering them. I now there are a few pros and con to each

but maybe stay with me, you could combine them why don't you shoot some goats with a birth control pill while you move a few so less babies are born that year and you have a few less. If you repeat the proses for multiple year you could adventaly get rid of all of the goat with all the risk of them dieing while you move them.

### ***Preliminary Alternatives: Increased Nuisance Control***

#### ***CONCERN STATEMENT:*** (Concern ID: 52575)

Commenters stated that management of mountain goats in the park should include increased nuisance control, particularly in areas with high concentrations of goats and humans. Commenters also expressed concern about the amount of time it takes for park rangers to arrive at areas where goats have congregated. One commenter suggested that there should be staff dedicated to nuisance control to prevent goats from moving away from human interactions without receiving aversive conditioning.

One commenter noted that while increased nuisance control may be effective in the short term, it would not be effective for managing habituated goats in the long term.

#### ***Representative Quote(s):***

**Corr. ID:** 26

**Representative Quote:** Nuisance control absolutely should be implemented at areas where concentrations of goats and humans have been identified.

**Corr. ID:** 52

**Representative Quote:** Increased Nuisance Control may reduce human conflicts with mountain goats temporarily and help alleviate negative impacts on natural resources to some degree. The persistence of mountain goats (those not habituated) allowed by this alternative is not a long term solution.

**Corr. ID:** 86

**Representative Quote:** I would be helpful to have staff dedicated to nuisance control and public education. As it stands, when a group of 12 goats shows up at Hurricane Hill, it may take hours for a patrol ranger to show up, if they are even available. By then, hundreds of visitors might have interacted with the goats, and the goats will move off without any aversive conditioning.

### ***Preliminary Alternatives: Capture and Translocation***

#### ***CONCERN STATEMENT:*** (Concern ID: 52576)

Commenters expressed concern over the capture and translocation of mountain goats in the park, suggesting that translocation efforts often cause undue stress on the animals and can sometimes result in death, and can result in impacts on human safety.

One commenter stated that translocation of mountain goats should only be used where economically, technically, and ecologically feasible.

#### ***Representative Quote(s):***

**Corr. ID:** 4

**Representative Quote:** Translocation should be used only where feasible and ecologically sensible. Too often, translocation efforts are expensive, labor-intensive, and inhumane, resulting in increased stress and likelihood of mortality in both the captured animal and the receiving population.

Therefore, if this method is used at all, it should be in a limited capacity - strictly where it makes ecological and economical sense.

**Corr. ID:** 44

**Representative Quote:** You could also argue that live capture is inhumane: Animals do feel fear, experience pain, suffer injuries, are traumatized, and often killed. Due to the nature of the habitat mountain goats occupy these unpleasant outcomes are a part of capture. Even the most skillful, well-conducted operation involves a lot of animal pain and suffering.

**Corr. ID:** 90

**Representative Quote:** Clearly relocation is a kinder solution but I'm concerned with the dangers for humans involved.

#### ***CONCERN STATEMENT:*** (Concern ID: 52577)

Commenters advocated for the capture and translocation of mountain goats. Areas suggested for translocation included: Alaska, British Columbia, Washington, other parks, areas where goats are a native species, areas of the Rocky Mountains where mountain goat populations have diminished, and areas of the Cascade Mountains where mountain goats are experiencing genetic isolation.

Several commenters made specific suggestions for carrying out the capture and translocation of goats, including capturing only male mountain goats and moving them to areas lacking genetic diversity, and keeping family and social groups together to make this alternative less stressful and more compassionate.

One commenter suggested that the capture and translocation alternative include the following detailed analyses: a risk analysis of spreading disease; a cost-benefit analysis; a level of effort analysis; and an analysis of potential technology and techniques.

Another commenter stated that the park should work closely with agencies (national parks, national forests, and tribes) for the relocation of mountain goats to areas where their populations have become threatened.

#### ***Representative Quote(s):***

**Corr. ID:** 8

**Representative Quote:** Perhaps a great solution to this problem is to capture a good number of the goats in the Olympics, and transfer them to areas of the Rockies where their numbers have declined, or are just hanging on by a thread. For example, they have been eliminated in the Lost River Range, which is Idaho's highest range. Idaho Fish and Game promotes recovery, but nothing really happens. This would be a great chance to reintroduce them there. I'm sure there could be funding in place by some non-profits to help with the transfer, quarantine, and rerelease.

**Corr. ID:** 17

**Representative Quote:** (1) relocation of the entire existing goat populations to areas in Washington State (and/or British Columbia, and potentially Alaska) where these animals are native, or

**Corr. ID:** 19

**Representative Quote:** It would be most compassionate if the current family and social groups could stay intact, to lessen the stress of the displacement.

**Corr. ID:** 25

**Representative Quote:** Capture and remove all the males from the population. They could be placed in a area that is suffering from depletion due to lack of genetic diversity.

**Corr. ID:** 26

**Representative Quote:** Translocation is a win-win option that should explored in detail, including

risk of spreading diseases between populations. This analysis should also include cost-benefit and level of effort analysis. What techniques and technology are required, have these techniques been successful in the past in Olympic NP, how many person-hours, and dollars would be required. This may be a viable option for a portion of the goat population or from specific areas.

**Corr. ID:** 45

**Representative Quote:** I would support trapping and relocating ALL goats to the Cascades and other locations where goats are native and in need of supplemental population.

**Corr. ID:** 58

**Representative Quote:** The native mountain goat populations in the Washington Cascade Mountain Range are currently adversely affected by geographical isolation, causing negative impacts on the genetic diversity of these populations (lower genetic diversity). It seems possible to me that translocating selected goats from the Olympics to the isolated goat populations in the Cascades could act to increase the genetic diversity of these latter populations. In this manner not all the Olympic goats would have to be removed by lethal means, a plus for the Park in terms of public relations. Rather than viewing the removal in a completely negative light, relocation could be publicized as a positive aspect of Olympic goat removal.

**Corr. ID:** 72

**Representative Quote:** We are also aware that some mountain goat populations have become threatened in their native habitats in other national parks, national forests, and tribal lands. We urge the park to work closely with these agencies regarding possible relocation of Olympic's goats.

**Corr. ID:** 83

**Representative Quote:** I think the wild mountain goats should be removed from ONP and sent back to Alaska, which I understand was where the animal originated.

**CONCERN STATEMENT:** (Concern ID: 52579)

One commenter indicated that capture and translocation of mountain goats is not a viable management option.

**Representative Quote(s):**

**Corr. ID:** 44

**Representative Quote:** Mountain goats cannot be eliminated from the Park or the Peninsula through live-capture and translocation no matter how efficiently, intensively, or prolonged these operations are conducted.

**CONCERN STATEMENT:** (Concern ID: 52580)

One commenter suggested that mountain goats be relocated and sold to interested zoos and game farms for the cost of removal.

**Representative Quote(s):**

**Corr. ID:** 69

**Representative Quote:** Sell them: Offer to relocate as many goats as can be sold for the cost of removal. Any zoo, game farm, or other legally entitled entity that can pay the cost of removal should get first chance at goats. At some point, the cost will exceed the demand, and this method will meet its limit. However, its inclusion will be a political benefit. Any group or individual that opposes killing of goats will have the opportunity to buy their clemency.

## ***Preliminary Alternatives: Removal (lethal)***

### ***CONCERN STATEMENT:*** (Concern ID: 52581)

Commenters advocated for lethal removal of mountain goats. They indicated that this should be the primary management strategy because it represents the best use of limited resources; has the highest likelihood of long-term success; is the most cost effective strategy; preserves the natural landscape; and has a low risk to human safety.

One commenter stated that lethal removal efforts must be done in conjunction with Olympic National Forest to prevent reintroduction of mountain goats to the park.

Another commenter suggested that park staff examine lethal removal strategies at other parks when developing a strategy for Olympic National Park and that humane alternatives should be examined.

Lastly, one commenter noted that the means of lethal removal may impact their support of this management strategy.

#### ***Representative Quote(s):***

**Corr. ID:** 4

**Representative Quote:** Lethal removal should be the primary management strategy to make the best use of limited resources and have the highest likelihood of long-term success.

**Corr. ID:** 26

**Representative Quote:** I strongly recommend and support removal through killing. Develop a strategy to define target areas, close the areas to humans for short periods, shoot the goats and haul out or bury the carcasses. Surely, there are lethal control examples from other NPS sites. A rifle shot can be a humane and quick way of killing an animal. Alternative techniques, such as poisons in salt blocks or darts with drugs, must exist.

**Corr. ID:** 63

**Representative Quote:** The proper response to the goat issue is for lethal removal from the park in conjunction with Olympic National Forest to prevent re-introduction. This action would enable Olympic National Park to fulfill its stewardship responsibilities as well as address the human safety issue.

**Corr. ID:** 69

**Representative Quote:** The most cost-effective way to promote the long-term health of the Olympic Wilderness will be to devote nearly ALL available resources (including political, and interagency) to eliminating the goat population. At this time, there is no more useful, efficient or effective wilderness protection effort than to eliminate the exotic mountain goat population. As long as there is even one breeding pair of exotic mountain goats left in the Olympic Wilderness, all other efforts toward on behalf of the wilderness are relatively wasteful, and will not return as much long term wilderness value as goat elimination.

**Corr. ID:** 75

**Representative Quote:** I ask you to recommend the elimination of all the non-native goats on the Olympic Peninsula. I know it will cause resistance from animal rights people, and I care about animals, but I am more of an environmentalist. They are decimating the environment and must be permanently removed to save what we can of the natural landscape.

**CONCERN STATEMENT:** (Concern ID: 52582)

Commenters suggested specific methods for lethal removal, including the use of professional sharpshooters and park rangers. Additional suggestions included shooting mountain goats from helicopters early in the season, shooting all male mountain goats, and lethally removing all problem mountain goats.

One commenter, while advocating for the use of sharpshooters, stated that these efforts would likely need to be repeated because this method would be unlikely to eliminate all mountain goats.

***Representative Quote(s):***

**Corr. ID:** 20

**Representative Quote:** If there is a particular Goat that proves that it is a threat, then destroy the animal as you would a problem Bear or Cougar or any other dangerous animal.

**Corr. ID:** 25

**Representative Quote:** Bring in professional sharpshooters/sheep-goat hunters and kill all the males in the population.

**Corr. ID:** 27

**Representative Quote:** I think the Park is responsible for immediately taking action when an aggressive mountain goat situation is reported. The goats have been in the Park long enough to have become habituated to human presence and in some cases no longer keep their distance. In the instance of the fatal goring a few years ago, the hikers were unable to move to a safe distance as recommended. They were actually stalked by the particular goat. There had been many reports that season. I had seen the posters myself on hikes. In fact, a few days before the fatal incident I was hiking the Hurricane Ridge Trail and noticed that the poster re aggressive goats had been removed. I mistakenly thought that the problem had been dealt with. Not so, even after repeated reports. There must be some kind of protocol put in place to remove an aggressive goat.

**Corr. ID:** 42

**Representative Quote:** The most effective, and least costly solution to the issue in the short term might be lethal control of their numbers by sharpshooters, though this would likely arouse sentimental outrage in some members of the public. However, this method is unlikely to eliminate the goat population entirely, and would have to be pursued again whenever goat numbers increase to a point where they damage natural vegetation.

**Corr. ID:** 69

**Representative Quote:** Make use of opportunities: Allow any ranger, who is otherwise qualified to carry and use a firearm, to shoot goats whenever conditions are appropriate. (i.e. There is no chance that a missed shot could harm people or wildlife, there is no hazard to the ranger or other people, visitors are either not present, or are supportive of such action, the carcass will not be a problem, etc.)

**Corr. ID:** 69

**Representative Quote:** Last: hire skilled professionals to rapidly and humanely shoot any remaining goats from helicopters. Make use of early season concentrations in snow-free portions of high country habitat, both for efficiency, and for minimizing visitor presence.

**CONCERN STATEMENT:** (Concern ID: 52583)

Multiple commenters noted that they are opposed to the lethal removal of mountain goats.

***Representative Quote(s):***

**Corr. ID:** 66

**Representative Quote:** I am firmly against removing all goats through lethal means.

**Corr. ID:** 78

**Representative Quote:** Do not shoot to kill animals.

**CONCERN STATEMENT:** (Concern ID: 52584)

One commenter noted that standards promulgated by the Humane Society consider euthanizing by gunshot to be humane.

**Representative Quote(s):**

**Corr. ID:** 44

**Representative Quote:** It should be noted that euthanizing unwanted animals through gunshot is considered humane by standards promulgated by the Humane Society of the United States.

**CONCERN STATEMENT:** (Concern ID: 52585)

Advocating for an eradication alternative, one commenter stated that the "lethal removal" alternative in the scoping notice is unclear.

**Representative Quote(s):**

**Corr. ID:** 41

**Representative Quote:** It is not clear from the scoping notice whether the "lethal removal" alternative refers to occasional removal of individual, habituated, "problem" goats, or whether it includes the broader alternative of eradicating this non-native species from the park. Please consider an "eradication" alternative.

**Preliminary Alternatives: Other/New Alternatives**

**CONCERN STATEMENT:** (Concern ID: 52586)

Commenters supported hunting as a tool to be used in the management of mountain goats within the park. Specific suggestions included: (1) achieving public buy-in by allowing limited hunts through the Washington Department of Fish and Wildlife; (2) conducting a hunting lottery; (3) holding a supervised hunt; (4) selling hunting licenses; (5) giving meat acquired from hunting to food banks; and (6) offering limited hunting permits with park ranger guidance.

One commenter stated that approval of hunting should be conditional on the park's ability to minimize impacts on the environment and the experience of other park users.

**Representative Quote(s):**

**Corr. ID:** 4

**Representative Quote:** While lethal removal can often be met with popular disapproval, it may be possible to increase public buy-in if perceived direct benefit can be maximized. For example, if very limited hunts through the WA Department of Fish & Wildlife Master Hunter Program (no affiliation) were allowed and all meat was required to be donated to local area food banks.

**Corr. ID:** 14

**Representative Quote:** In my opinion, the best and most effective means for this to be achieved would be to use 'lethal measures', as it was put in the information provided by the National Park Service website. Said lethal measures should be in the form of one or both of two options: 1)

conduct a lottery for hunting tags which would allow hunters to go in and remove only the mountain goats

**Corr. ID:** 30

**Representative Quote:** The goats could be hunted and the meat brought out and given to those who process animals or somehow directed to the food banks which can always use meat.

**Corr. ID:** 37

**Representative Quote:** There are likely avid hunters who would like the opportunity to hunt these animals, and approval by special licensing would be a win-win solution. Approval should be conditional on their ability to minimize impact on the environment and the experience of other park users.

**Corr. ID:** 50

**Representative Quote:** Any goats removed from the park, should be done by public hunting, you could require the use of a licensed guide, have a drawing for a tag, require that a kid or nanny be hunted prior to taking a Billy. A good revenue source, good public policy.

**Corr. ID:** 69

**Representative Quote:** A special, supervised hunt: Auction off tags for a special goat season. Each tag winner would be escorted by park staff for the entire hunt, to ensure visitor safety, and safety of other wildlife. Starting bids would have to cover this cost. I believe this once in a lifetime opportunity would draw enough paying participants to seriously dent the population, while creating a constituency in favor of this action.

#### **CONCERN STATEMENT:** (Concern ID: 52587)

Commenters stated that native predators, such as wolves, should be reintroduced to the park to manage the mountain goat population. This method was suggested as a way to achieve the balance of the original ecosystem. One commenter suggested that the Washington Department of Fish and Wildlife's current policy of allowing grey wolves to establish packs in Washington State as a specific example.

**Representative Quote(s):**

**Corr. ID:** 3

**Representative Quote:** I hope you will consider wolf reintroduction as part of your goat management plan. Given that goats in the Olympics seem to rebound after some culling, wolves may help human efforts to keep the goat populations low enough to minimize damage. Wolves would also help keep elk and deer on the move and reduce their impact on riparian vegetation that benefits salmon, steelhead, and bull trout.

**Corr. ID:** 42

**Representative Quote:** The mountain goats are able to increase in numbers because of the absence of predators to effectively control them. Washington Department of Fish and Wildlife's current policy of allowing grey wolves to establish packs in Washington State may provide a solution in the long run. Several people have suggested, that wolves will range into the south Cascades and subsequently on the Olympic peninsula. If the wolves will range to the higher elevations favored by the mountain goats, they may provide a long range, if partial, solution. However, this resembles other efforts at bio-control, introducing a second exotic species to control an established exotic, and the number of cases where it has worked is small.

**Corr. ID:** 60

**Representative Quote:** Brackets indicate recommended [removals] and stars indicate \*recommended additions\*.

Page 3: Preliminary Alternative Concepts

\*Reintroduction of native predator species alternative\*

WNPS comment: Some of our members favor the addition of "Reintroduction of Native Predator Species" as an additional Alternative Concept that should be considered as part of the EIS. WNPS appreciates the relevance of the complete list of impact topics proposed by the Park Service and strongly supports the inclusion of those that are directly related to native plants and their habitats.

**Corr. ID:** 66

**Representative Quote:** If the goal is to return the plant and wildlife populations of the Park to where they were 100 years ago, then the Park must also look at reintroducing species that it chose to exterminate, such as the wolves, which interestingly, were exterminated around the same time the mountain goat was introduced. Perhaps if the goats had a predator like the wolf, their overpopulation and impact on the Park would be less of a problem.

**Corr. ID:** 71

**Representative Quote:** Here's a solution for keeping them under control: re-introduce wolves back into the Park. They were there before humans (men) eliminated them. They're beautiful, belong there, and would be predators to the goats. We'd still have some goats around but not so many as to overgraze the wilderness or be a threat to humans. Wolves would have enough to eat inside the Park so they wouldn't have the need to go where domestic livestock live.

**CONCERN STATEMENT:** (Concern ID: 52588)

Commenters suggested that mountain goats be removed from particular areas of the park and that goat-free areas should be established in areas with high concentrations of rare and endemic plants.

**Representative Quote(s):**

**Corr. ID:** 66

**Representative Quote:** It seems that Klahane Ridge is one of the more vulnerable places for both humans and the endemics. Perhaps this should be an area of priority control.

**Corr. ID:** 72

**Representative Quote:** We also recommend an alternative (or part of a preferred alternative) that, short of removal, would at the very least establish permanent goat-free areas in parts of the park that are known to support the largest concentrations of rare and endemic plants such as the north-central, northeast, and eastern alpine areas.

**CONCERN STATEMENT:** (Concern ID: 52589)

Commenters made several suggestions regarding the use of reproductive control methods for the management of mountain goats in the park, including shooting mountain goats with immunocontraceptives from helicopters and capturing and castrating male mountain goats.

**Representative Quote(s):**

**Corr. ID:** 25

**Representative Quote:** Capture and castrate all the males within the population.

**Corr. ID:** 69

**Representative Quote:** Experimental chemical sterilization by projectile darts: I don't know if such an injectable contraceptive exists, but if goats can be shot from helicopters, they could also be darted.

**CONCERN STATEMENT:** (Concern ID: 52591)

One commenter noted that the plan/EIS should evaluate methods for eliminating mountain goats in the

adjacent wilderness in the Olympic National Forest.

***Representative Quote(s):***

**Corr. ID:** 69

**Representative Quote:** Finally, this impact statement must propose and evaluate methods for ensuring that a goat population does not remain in the areas outside of Olympic National Park. I know that extraordinary provisions, even legislation, may be necessary to eliminate them from the adjacent National Forest wildernesses, but those areas must be included in the plan as well.

***CONCERN STATEMENT:*** (Concern ID: 52592)

One commenter stated that alternatives should include only scenarios for total elimination. Other alternatives should be described only to demonstrate their prohibitive long-term costs and failure to meet park mandates.

***Representative Quote(s):***

**Corr. ID:** 69

**Representative Quote:** Given that any retention alternatives, when extended thus into the future, will have astronomical cost and impact. I urge that most of your proposed and evaluated alternatives reflect the variety of methods and scenarios for total elimination. These possibilities are many and varied. The retention alternatives should be included only to the extent necessary to show their prohibitive long-term expense, and more importantly, their ultimate failure to meet Park mandates.

***CONCERN STATEMENT:*** (Concern ID: 52593)

Commenters stated that salt licks should be included as a tool in the management of mountain goats in the park. Specific suggestions included placing salt licks to strategically move goats away from areas where humans congregate within the park.

***Representative Quote(s):***

**Corr. ID:** 41

**Representative Quote:** Please consider a "goat attraction" alternative. The current goat management plan appendix describes how to deploy a salt lick in order to capture goats; please consider the costs, effects, and logistics of supplying salt in areas that are off-limits to humans, in order to draw the goats away from areas that are heavily used by visitors.

**Corr. ID:** 77

**Representative Quote:** Mineral salt is available in 40 lb blocks used by cattle and horse owners. They are mounted on a post or just on the ground. Why not look into placing some of these blocks in areas where the goats move away from human spots. I know this is using an artificial method but they do occur naturally. These blocks are solid and have to be licked. They do not wash away easily. They are usually available at local stores and are not very expensive. It is worth a try - the goats would like it and it would keep them away from camping sites.

***CONCERN STATEMENT:*** (Concern ID: 52594)

One commenter stated that the plan/EIS must include the research and recommendations from the 1995 Draft EIS, particularly from the proposed action.

***Representative Quote(s):***

**Corr. ID:** 73

**Representative Quote:** The Mountain Goat Management Plan for Olympic National Park must include the research and recommendations that went into the February 1995 Draft EIS, particularly Alternative 1 (the proposed action).

***CONCERN STATEMENT:*** (Concern ID: 52595)

Commenters stated that increased education should be used as a mountain goat management tool in the park to increase understanding of the issue. One commenter stated that this could be used as a way to convince the public that these animals are not an asset to the park.

One commenter stated that future management of mountain goats should consider the potential effects of non-compliance by park visitors. This commenter indicated that not all visitors read signs, abide by rules on the signs, or feel comfortable following instruction to throw rocks.

***Representative Quote(s):***

**Corr. ID:** 41

**Representative Quote:** Visitor Safety: The current management plans relies heavily on visitor education (signs at trailheads). Please consider the potential effects of visitor non-compliance with any goat management plan on the goats, the visitors, and the habitats. Not all visitors read the signs. In many goat-infested areas of the park, people urinating 200 yards from the trail or the campsite is either unsafe or not possible. Especially in the case of campsites, even the most willing-to-comply person who has to pee in the middle of the night is unlikely to travel 200 yards from camp to do so. (And in some areas, if they did, they would likely be within 200 yards of another campsite.) Further, not all visitors will be willing to throw rocks at goats, especially in the presence of other visitors, especially given that many of your visitors have been conditioned to NOT haze the wildlife.

**Corr. ID:** 46

**Representative Quote:** I mentioned the mountain goat's approaching us from behind as we sat quietly eating our lunch. Ever since that happened, I have been asking myself, "Why did the goat, a wild animal, approach us?" I think it is an important question. It was not stalking us, as a carnivore might have. The only reason a wild herbivore would approach humans, I think, would be in expectation of getting something it wanted from them. What would this something be? I think the animal had been fed, perhaps something salty. That is why I added a strong education element to my proposed alternative. I think that is very important, and I hope you give my suggestion your full consideration.

**Corr. ID:** 70

**Representative Quote:** With a strong information program including pictures of damaged landscape and stories about people/goat interaction that were not pleasant, you could probably convince the public that mountain goats were not an asset in ONP.

***CONCERN STATEMENT:*** (Concern ID: 52596)

One commenter provided several reasons why the preliminary alternative concepts would not be effective, noting that removal of aggressive goats would be expensive, salt licks would be ineffective, and rock throwing by visitors may increase mountain goat aggression.

***Representative Quote(s):***

**Corr. ID:** 47

**Representative Quote:** Trying to just pick out the "aggressive" goats will be difficult and expensive, salt licks will probably be ineffective, and advising people to throw rocks at a goat surely can't be a great idea. Hazing the goats might increase aggression.

**CONCERN STATEMENT:** (Concern ID: 52597)

Citing a specific example in Australia, one commenter suggested that mountain goats could be trapped and removed, their meat sold to ethnic communities, and a small group of goats could be maintained as breeding stock to repeat the process as needed.

**Representative Quote(s):**

**Corr. ID:** 42

**Representative Quote:** The recent experience of managers of the Flinders Ranges National Park of South Australia provides a cautionary tale: A small population of a threatened marsupial species, the yellow-footed rock wallaby, occurs in the Park. Feral goats here, as in several regions of Australia, are damaging and removing vegetation to the extent that native marsupials cannot thrive. Park managers contracted a commercial organization to trap and remove the goats. These people saw a good thing, as they were selling the goats to butchers in ethnic communities where goat flesh is prized, so they always left a small group of mature goats as breeding stock, and in a couple of years they would offer their services again.

**Preliminary Alternatives: General Goat Removal**

**CONCERN STATEMENT:** (Concern ID: 52598)

Commenters stated that regardless of the means of removal, mountain goats must be entirely removed from the park and surrounding areas because they (1) are not native; (2) do not belong in wilderness; (3) cause negative impacts on the park environment and native species; (4) are becoming increasingly aggressive; and (5) have no natural predators.

Commenters indicated that removal should be carried out in a cost effective manner, humanely, immediately, and should not be done through sporadic efforts.

One commenter stated that the removal method chosen should be one that is safe for humans involved with the process and least traumatic to mountain goats.

One commenter noted that complete and humane removal of the mountain goats would take time and effort and would be expensive.

**Representative Quote(s):**

**Corr. ID:** 14

**Representative Quote:** Any means used to deal with the mountain goats should most definitely be humane, so UNDER NO CIRCUMSTANCES should poison, traps, aerial gunning or hunting with dogs be allowed to be used.

**Corr. ID:** 32

**Representative Quote:** In view of the fact that the goats are an "invasive" unnatural species to the ONP area with few natural predators to keep their population balanced I would support their removal from the park in any way that would be fiscally feasible, including culling. Anything less and their population would surely rebound requiring this issue to be dealt with again in the near future.

**Corr. ID:** 36

**Representative Quote:** The best method of removal would depend on what is safest for personnel involved and what is least traumatic to the animals.

**Corr. ID:** 45

**Representative Quote:** In order to protect the diverse and endemic plant species and communities in the park, I think it is important to remove goats completely from the park. The limited removals undertaken to date do not seem to have reduced the population and goats have become more widespread and aggressive.

**Corr. ID:** 51

**Representative Quote:** Eradicate it, humanely yes to the extent possible. But, eradicate it from the region. It's not natural there.

**Corr. ID:** 55

**Representative Quote:** I do believe that their numbers need to be controlled for environmental reasons as there are no natural predators.

**Corr. ID:** 69

**Representative Quote:** This isn't like the balance between visitor safety and preservation of grizzlies in Yellowstone, or park wolves and nearby ranch cattle. There is no trade-off between enjoyment and preservation, as there is with so many wilderness issues. Both sides of the balance demand goat removal. National Park wilderness is not the place to provide viewing experiences for animals that do not belong there. That's what zoos are for.

**Corr. ID:** 73

**Representative Quote:** Park resources are limited and it's impossible to resolve the "goat issue" through sporadic attempts to scare them away. We cannot allow these strong, well-adapted and increasingly aggressive animals to continue to destroy fragile ecosystems and eventually dominate the Olympic Mountains.

**Corr. ID:** 79

**Representative Quote:** Complete, humane goat removal is likely to be costly in time, effort and expense.

#### **CONCERN STATEMENT:** (Concern ID: 52599)

Several commenters stated that mountain goats contribute to the wilderness experience and should not be removed from the park.

**Representative Quote(s):**

**Corr. ID:** 15

**Representative Quote:** I do not advocate total elimination. What is wilderness without wildlife?

**Corr. ID:** 20

**Representative Quote:** Please do not try to eradicate the Goat population in the Olympics as they greatly add to the whole Wilderness experience on many levels!

#### **Consultation and Coordination: General Comments**

#### **CONCERN STATEMENT:** (Concern ID: 52600)

Citing a variety of management options (such as lethal removal and capture and translocation), commenters noted that efforts would require cooperation and coordination with adjacent landowners and other affected agencies to effectively manage the mountain goats. Olympic National Forest and Washington Department of Fish and Wildlife were the two specific entities identified.

One commenter also stated that the ongoing cost of management should be assessed for both the park and adjacent landowners.

***Representative Quote(s):***

**Corr. ID:** 41

**Representative Quote:** Like any invasive species, the goats do not recognize property boundaries, and management at whatever level is ultimately chosen (eradicate, control, no action) will affect adjacent landowners, and perhaps require cooperation among them. Please include a consideration of what it would mean to cooperate with Olympic National Forest and any private landowners with alpine property on the peninsula to eradicate goats from the entire peninsula, and the ongoing costs of ongoing control for both the Park and adjacent landowners, should an alternative other than eradication be chosen.

**Corr. ID:** 43

**Representative Quote:** The Draft EIS should address the need for active involvement by both the state of Washington and the US Forest Service in the mountain goat management plan and its implementation. The state has management responsibility for animals on USFS lands. USFS does have responsibility for protection of habitat, which includes plants. Olympic National Forest (ONF) alpine habitat along its border with ONP has large numbers of rare, sensitive, and endemic plant species -- and healthy populations of mountain goats. Lethal removal of goats -- the only real solution to this problem -- will be meaningless unless it is carried out on both sides of the invisible border between ONF and ONP. Oversimplified example: killing all the goats in Upper Royal Basin and Deception Basin won't do the job -- they'll just continue coming over from Mt. Fracaba, Milk Creek, etc.

**Corr. ID:** 44

**Representative Quote:** The Forest Service has to have a management responsibility for protection of the habitat mountain goats occupy. The Buckhorn Wilderness contains areas with more occurrences (number of species) of rare, sensitive, and endemic native plants than anywhere else on the Peninsula.

**Corr. ID:** 54

**Representative Quote:** While I welcome the management of goats in principle, they will never be fully managed, as the US Forest Service is not eliminating the goats on their lands and this will always pose a problem for park management, as goats from the USFS lands will always wander onto NPS lands. Whether the goats were naturally occurring at some point or introduced at some point, they are here now and must be looked at from a management standpoint.

## ***Impact Analysis: Impact Analyses***

### ***CONCERN STATEMENT:*** (Concern ID: 52602)

One commenter stated that any management action that does not result in elimination of mountain goats from the park must provide a thorough analysis of impacts into the future.

***Representative Quote(s):***

**Corr. ID:** 69

**Representative Quote:** Any alternatives that do not result in total elimination, including the traditional "no action" alternative, must be thoroughly analyzed for these adverse impacts, extending indefinitely into the future.

## ***Impact Topic: Mountain Goats***

### ***CONCERN STATEMENT:*** (Concern ID: 52603)

Commenters noted that mountain goats are a non-native species to the Olympic Peninsula, introduced by humans, and that mountain goats are adversely impacting park resources because their population is increasing, their territory is expanding, they are highly acclimated to human presence, and have nowhere to go to avoid human interaction. Commenters further stated that the mountain goat population is likely to increase because of milder winters resulting from climate change and the absence of predators.

One commenter stated that the mountain goat population has rebounded and impacts have increased as a result of management efforts that were halted in 1995.

#### ***Representative Quote(s):***

**Corr. ID:** 25

**Representative Quote:** It seems our goats are not that difficult to entice and capture. As they wander right up to the crowd on a nice evening at Hurricane Hill. They have become quite acclimated and comfortable with the human presence. Part of the problem with reducing the human contact is the goats really have no place to go. We have trails and access to the highest points, and they have no escape, i.e. going higher and farther, out of reach. Which is a option for them in other ranges.

**Corr. ID:** 55

**Representative Quote:** I do respect these goats, enjoy seeing them, however, I do think that their numbers and territory is expanding. They also seem to be getting used to human contact.

**Corr. ID:** 57

**Representative Quote:** The mountain goats are an invasive species introduced by man and they are doing what invasive species do. With no natural predators, their numbers have increased. They feed on the native plant species and, are a danger to humans.

**Corr. ID:** 79

**Representative Quote:** Mountain goats were introduced to Olympic National Park by humans. They are not native to the Olympic Peninsula. Their introduction has never been without consequences. Mountain goats are destructive to indigenous native plants and have proven to be a danger to park visitors, at least in part because of their need for, and attraction to, the salt found in humane urine.

### ***CONCERN STATEMENT:*** (Concern ID: 52604)

One commenter stated that mountain goat hazing efforts are not as effective as they were in the past and that the animals are now more likely to stand their ground or advance.

#### ***Representative Quote(s):***

**Corr. ID:** 69

**Representative Quote:** Also, the present goats appear more likely to be angered by "hazing" actions than in the past. 30 years ago, when you threw a rock at a goat, it usually made a prompt, (but often temporary) retreat, but I never saw one stand its ground or advance, as I have seen recently.

### ***CONCERN STATEMENT:*** (Concern ID: 52605)

One commenter observed that as the mountain goat population has grown since the 1980s, there appears

to be a higher proportion of more aggressive goats. The commenter suggested that the management actions of the 1980s removed the less aggressive goats leaving the more aggressive goats to reproduce. They noted that any future management efforts would likely have the same effect.

***Representative Quote(s):***

**Corr. ID:** 69

**Representative Quote:** It appears (both from my own observation, and reports of others) that the goat population that is rebuilding after their near-elimination in the 1980s includes a higher proportion of more aggressive goats than previously existed. I theorize that perhaps the removal effort selected for less aggressive goats, leaving the more aggressive ones that were harder to catch as the gene pool for the current population. This kind of selection for "desired" traits is the basis of thousands of years of animal husbandry. Any limited removal or destruction alternative will likely increase this selection for more dangerous goats over the long term.

***CONCERN STATEMENT:*** (Concern ID: 52606)

One commenter noted that mountain goats are attracted to areas where humans and other animals have been, and as a result, mountain goats are responsible for expanding existing trails and creating new trails where none existed previously. This commenter also indicated that there is a similar pattern with backcountry campsites where mountain goats discover abandoned campsites and dig for salts left behind.

***Representative Quote(s):***

**Corr. ID:** 69

**Representative Quote:** In 1975, as a volunteer in Royal Basin, and for 8 additional seasonal ranger summers in Olympic National Park, one of my significant tasks was to observe and manage goat-human interaction in the backcountry. My initial orientation to this task came from Bruce Moorhead, the Park Biologist, but my most significant education was on-the-job, and lasted many seasons, including the peak of the goat removal project.

What I saw was that, wherever there were goats, even intermittently, human impact was multiplied 4-10 times. A party could camp in an appropriate spot, and leave no trace of their presence, until the goats came in, possibly days later. When the goats found the campsite, they trampled, and excavated for urine and other salt until the site was severely impacted. This paradoxically made it more likely that the site would be used, and impacted more by humans, which would then attract more goat visits. This cycle is quite destructive, and I have not observed it significantly with native animals.

**Corr. ID:** 69

**Representative Quote:** There is a similar cycle that builds trails where native animals and visitors have never made them. Goats are attracted to human destinations, and their travel to them will create trails where none existed before. People will then see and follow these trails when exploring (otherwise) wild places. The human use of these goat trails will then attract more goat travel (in search of salt), and more impact (digging for it), which makes the route even more obvious for people, and so forth.

Many animals make trails that people then follow (especially elk), and following these game trails is a wonderful experience of the wilderness. But with naturally occurring animals, there is no feedback loop as there is with the goats, so there is no additional impact. I have observed this phenomenon around Mount Angeles, and in the basalt ridges in the headwaters of the Dungeness, often adjacent to outcrops of endemic wildflower species, such as Piper Bellflower.

**CONCERN STATEMENT:** (Concern ID: 52607)

One commenter noted that mountain goats were introduced and became established prior to the establishment of the park; therefore, they should be considered a native species.

**Representative Quote(s):**

**Corr. ID:** 64

**Representative Quote:** Park information states that Mountain goats are not native to the park. Since they were brought here and were well established before ONP was established, they should be considered "native". Isn't it the duty of the park system to protect areas and the wildlife within them. Refer to PDN July 8, 2004

**CONCERN STATEMENT:** (Concern ID: 52609)

One commenter stated that impacts from mountain goats can be observed even at very low population levels, indicating that there is no acceptable minimum population.

**Representative Quote(s):**

**Corr. ID:** 44

**Representative Quote:** the effects of mountain goats can be detected even at very low population levels. It is possible to observe trailing, trampling, wallowing, grazing, pellet groups, etc., even when few animals are present. Thus, there is no minimum acceptable population.

**Impact Topic: Vegetation**

**CONCERN STATEMENT:** (Concern ID: 52611)

Commenters stated that mountain goats are causing negative impacts on native vegetation, including decreased species diversity, erosion, irreversible damage to fragile alpine and subalpine ecosystems, and disruption of ecological processes. One commenter stated that mountain goats represent the main threat to site integrity.

One commenter also noted that where native alpine and sub-alpine plant communities have been damaged or altered by mountain goat activity, it will take decades or centuries for even partial recovery, because of the slow growth of these plants and the even slower processes of soil formation.

Another commenter stated that the impacts on native alpine and sub-alpine plant species by mountain goats would be confounded by anticipated impacts of climate change.

Commenters noted the park's endemic and native plants are highly valued by botanists, scientists, and the general public.

**Representative Quote(s):**

**Corr. ID:** 29

**Representative Quote:** Such plants face increased stress due to climate change. Insofar as the mountain goat adds to this stress, these plants will benefit from removal of this introduced herbivore.

**Corr. ID:** 42

**Representative Quote:** Where native alpine and sub-alpine plant communities have been damaged

or altered by goat activity, it will take decades or centuries for even partial recovery, because of the slow growth of these plants and the even slower processes of soil formation. Thus it is important to begin control efforts immediately so as to prevent further damage.

**Corr. ID:** 43

**Representative Quote:** Research has demonstrated that even low numbers of mountain goats can cause substantial damage to plant communities.

**Corr. ID:** 60

**Representative Quote:** Washington Native Plant Society members monitor native plants and their habitats. Our members have observed that the activities (cropping and wallowing) of introduced mountain goats disrupt the ecological processes of Olympic National Park and threaten park resources including the park's native and endemic plant species, fungi, and lichens. These observations are consistent with research concluding that mountain goats alter plant community structure, increase bare soil, and pose a risk to rare plant species (iv). UNESCO notes that the mountain goat is the main danger to the integrity of the site(v).

**Corr. ID:** 60

**Representative Quote:** Olympic Park's living legacy of endemic and native plants and corresponding habitats is unique and is highly valued by local, regional, and international botanists, citizen scientists, and much of the general public. People around the world appreciate the biodiversity of ONP, confirmed by its recognition as a World Heritage Site and Bioreserve status (iii).

**Corr. ID:** 73

**Representative Quote:** The goats' trampling, consumption of fragile and rare plants, deep and aggressive pawing/digging to create large rutting pits and wallows and intimidate visitors, and other behaviors have resulted in decreased species diversity, erosion, irreversible damage to fragile alpine and subalpine ecosystems, and dangers to Park staff and visitors.

#### **CONCERN STATEMENT:** (Concern ID: 52613)

Commenters stated that there are no definitive data showing that mountain goats would extirpate native plants.

Another commenter stated that data exist documenting mountain goats' feeding on specific endemic species.

**Representative Quote(s):**

**Corr. ID:** 31

**Representative Quote:** Although it is true there is no definitive data showing that the mountain goats will cause extirpation of any native plants, there is data documenting their herbivory of endemics *Astragalus australis* var *cottonii*, *Campanula piperi*, *Aster paucicapitatus*, and *Senecio neowebsteri*. And the goat wallows and other habitat degradation are appearing on Klahhane Ridge again - - - and no doubt in other alpine habitat in ONP.

**Corr. ID:** 64

**Representative Quote:** The present population of goats seems sustainable and does not appear to be detrimental to indigenous plants.

**Corr. ID:** 66

**Representative Quote:** While I realize that the mountain goats are not native and there is concern for the endemic plant species, I understand that there is no definitive data showing that the mountain goats will cause extirpation of any native plants. I would imagine that if the goats were to cause the extinction of any plant species, they would have done so by now, seeing that they have been in the

park for over 90 years.

**CONCERN STATEMENT:** (Concern ID: 52615)

One commenter stated that impacts on vegetation from mountain goats should be analyzed in detail.

**Representative Quote(s):**

**Corr. ID:** 41

**Representative Quote:** Vegetation: Several rare and endemic plant species occur in ONP. Please include a specific analysis of goat predation on these plants.

**Impact Topic: Wildlife and Wildlife Habitat**

**CONCERN STATEMENT:** (Concern ID: 52616)

Commenters stated that mountain goats negatively impact fragile wildlife habitat through grazing, trampling, and wallowing and that these impacts are further compounded by climate change.

One commenter further noted that these impacts reduce the food supply for other mammals such as the Olympic marmot.

Another commenter stated that it is the park's responsibility to protect and preserve wildlife and wildlife habitat.

**Representative Quote(s):**

**Corr. ID:** 26

**Representative Quote:** 1) destructive of fragile habitat, which is highly susceptible to climate change impacts

**Corr. ID:** 41

**Representative Quote:** Natural Processes and Habitats: please consider how sensitive alpine areas of the park are likely to be affected by the presence of goats in this era of climate change. I do not know the time span you propose for the goat management plan. If it is a short term (say, 5 year, plan) you may think climate change analysis is out-of scope. I would argue that the Park has been studying the effects of goats since at least the 1970s, and that mainstream science shows that the effects of climate change are detectable on the time scale during which you have been studying the goats, therefore I believe it is prudent to analyze the potential effects of goats remaining in the park while native subalpine and alpine species (such as the Olympic marmot and endemic plants) and habitats face increasing pressure from climate change.

**Corr. ID:** 43

**Representative Quote:** As a National Park, an International Biosphere Reserve, and a World Heritage Site, Olympic National Park (ONP) is charged with protecting the native species of this place, which includes preservation of their habitat.

Through grazing, trampling, and wallowing, mountain goats are degrading habitat and damaging ecosystems in these mountains.

**Corr. ID:** 62

**Representative Quote:** Their feeding and wallowing destroys unique plants and reduces the food supply for other mammals such as the Olympic Marmot.

**CONCERN STATEMENT:** (Concern ID: 52617)

One commenter noted that conservation of alpine habitat is essential to providing sufficient sustainable alpine niches for resident and migratory bird species.

This commenter also suggested that information from the Olympic Park Associates 1995 analysis be included in the plan/EIS.

**Representative Quote(s):**

**Corr. ID:** 61

**Representative Quote:** We have reviewed the history of the goats in ONP. Most convincing was An Analysis of the Mountain Goat Issue in Olympic National Park prepared by Olympic Park Associates (OPA) in 1995. We believe the conservation and protection of ONPs alpine vegetation and habitats are essential to providing sufficient sustainable alpine niches for resident and migratory birds, several of which are protected or endangered. We recommend that the data in OPA's analysis be included in the eventually developed ONP Goat Management Plan.

**Impact Topic: Rare, Unique, Threatened, or Endangered Species**

**CONCERN STATEMENT:** (Concern ID: 52618)

One commenter stated that mountain goats cause measurable and observable effects on rare, sensitive, and endemic plants, soils, and native fauna that may be permanent and irreversible.

**Representative Quote(s):**

**Corr. ID:** 44

**Representative Quote:** There are measurable and observable effects, some probably permanent and irreversible, on rare, sensitive, and endemic plants, soils, and native fauna as a result of these introduced animals. There is impairment of the unique resources for which the Park was established. The Park is supposed to vigorously prevent this in fulfilling its stewardship responsibilities.

**CONCERN STATEMENT:** (Concern ID: 52619)

Commenters stated that the park hosts unique species and ecosystems that do not exist elsewhere and that the plan/EIS should include a vigorous evaluation of the impacts of mountain goats on these species.

**Representative Quote(s):**

**Corr. ID:** 69

**Representative Quote:** National Parks were established to protect not only what was there, but to protect the parks from what was NOT there. Olympic National Park's high country is what it is partly because there were no mountain goats. We have our own species of Marmot, and don't have the kinds that exist elsewhere. We have our own flowers, our own ecosystems. We don't have Ptarmigans or picas. All these small things combine to make a unique combination.

**Corr. ID:** 72

**Representative Quote:** With the affects of global warming becoming apparent in Olympic, OPA considers is essential to restore the park's durable ecological communities and processes. As you know, the alpine and sub-alpine plant and animal communities of the Olympics have survived through severe climatic fluctuations of the past two million years and beyond. It is important to note that sub-alpine plants and animals - - including five endemic wildlife species (one species, Olympic

marmot, and four subspecies) - - utilize the same sub-alpine habitats as non-native mountain goats. To our knowledge, these communities have evolved without the presence of large rocky-outcrop herbivores. The unique character of these communities, rich with endemic, near-endemic, rare, and disjunct plant species and associations, may be a direct result of this condition. The EIS should include a vigorous evaluation of impacts to these species and communities as well as soils, ecological processes, and wilderness character by exotic mountain goats.

### ***Impact Topic: Wilderness***

#### ***CONCERN STATEMENT:*** (Concern ID: 52620)

Commenters stated the benefits of wilderness areas and noted that most mountain goat impacts occur within wilderness areas.

One commenter further stated that the presence of mountain goats in the park is inconsistent with maintaining wilderness character.

#### ***Representative Quote(s):***

**Corr. ID:** 26

**Representative Quote:** Most mountain goat presence and impacts are in designated wilderness areas. Management of this wilderness should include removal of non-native species.

**Corr. ID:** 43

**Representative Quote:** In May of this year, ONP accepted public comment on its Wilderness Stewardship Plan. Surely the destructive presence of *Oreamnos americanus* is inconsistent with maintaining Wilderness Character in ONP.

**Corr. ID:** 62

**Representative Quote:** One of the gifts of wilderness is it provides protection for the plants and animals that may provide genes for future cures of human disease and other scientific discovery.

#### ***CONCERN STATEMENT:*** (Concern ID: 52621)

One commenter stated that potential strategies for managing goats in wilderness areas (e.g., using helicopters or sirens) would also have impacts on wilderness.

#### ***Representative Quote(s):***

**Corr. ID:** 47

**Representative Quote:** The idea of sirens is very depressing. As someone who hikes regularly, I can't imagine going into the wilderness to hear sirens. Since our money is paying for all this, I very much hope you will not implement these ideas.

**Corr. ID:** 54

**Representative Quote:** It is also interesting that the park states that the goats are affecting the wilderness but most assuredly the park would be using a helicopter to assist in the management of the goat, which also would have an affect on the wilderness.

### ***Impact Topic: Visitor and Employee Safety***

#### ***CONCERN STATEMENT:*** (Concern ID: 52623)

Commenters noted that mountain goats present threats to visitor safety within the park. Some commenters

also stated that if mountain goats had been removed as suggested by earlier studies, threats to visitor safety could have been avoided.

Commenters also stated that suggested nuisance control measures are often not taken seriously by park visitors and that these measures may provoke the mountain goats or be ineffective.

One commenter stated that visitors continue to feed the mountain goats despite National Park Service and US Forest Service direction discouraging further interaction.

***Representative Quote(s):***

**Corr. ID: 7**

**Representative Quote:** The human population ignores Park and Forest Service guidance on not feeding them, or encouraging their dependence upon humans for handouts. I just witnessed this 13 July on Mount Ellinor listening to a couple of people lament that there were not goats to see, touch, photograph, and feed treats to.

**Corr. ID: 63**

**Representative Quote:** If Olympic National Park had followed through on its 1995 Draft EIS with the Preferred Alternative: lethal removal, an unfortunate death would have been prevented and this whole repeat process would not be necessary.

**Corr. ID: 69**

**Representative Quote:** It appears that the goats are becoming immune to hazing behaviors, and therefore such efforts are losing their effectiveness, and likely triggering threatening behavior, rather than retreat. This means that the toolbox for managing goats for visitor safety is getting emptier over time, with the result that the goats will become an increasing safety and survival threat to human enjoyment of the wilderness (and maybe to other animals as well...).

**Corr. ID: 75**

**Representative Quote:** Also, I have an experience where I was not aware at the time of the my personal danger. Some years ago I was camped with my friend, a professional photographer, high above Royal Basin. My job was to shoo away the goats from his tripod and his large format camera and to keep the goats out of the picture. Especially to keep the goats from licking him and his camera lenses. I'm 5'3" and 110 lbs. and didn't know my danger in flapping shirts at them. In the middle of the first night a herd came thundering down on our little tent and split around us just seconds before possibly crushing us. I worked with trepidation through the next day and slept in fear the next night, then was glad to pack up and hike out.

**Corr. ID: 81**

**Representative Quote:** If the goats had been removed after earlier studies that made clear this needed to be done, the life of Bob Boardman would have been spared as well as the terrible related repercussions for his family, friends and hiking partners.

**Corr. ID: 86**

**Representative Quote:** My biggest concern is for public safety. I have watched park visitors read posted goat warnings and laugh as if the whole issue is just a joke. And I have heard others tell stories of getting very close to goats - intentionally. I have talked to parents of children who were so terrified they hid behind trees to get away from a goat.

**Corr. ID: 92**

**Representative Quote:** It must be difficult for most people to throw rocks at a big goat for what seems like no reason. Look how hard it is to get people to secure their food. That is, why ask for trouble, provoke the animal, if you don't have to.

**CONCERN STATEMENT:** (Concern ID: 52624)

Commenters stated that one fatal incident in 90 years is an anomaly and does not indicate that mountain goats are dangerous.

**Representative Quote(s):**

**Corr. ID:** 54

**Representative Quote:** I find it interesting that the park is using the fatality caused by a mountain goat as a reason why the mountain goat must be managed, yet the park is also contemplating the reintroduction of the wolf into the park. To date, there has only been one documented case of a human being killed by a mountain goat and at least three cases of wolves causing fatalities in the United States. While tragic, this is an anomaly that occurred.

**Corr. ID:** 66

**Representative Quote:** As for public safety concerns, the 2010 fatal incident was truly tragic and was the action of an habituated goat. Fatal human encounters are very rare. This one attack does not turn mountain goats in general into dangerous animals. This was the first in ONP in over 90 years.

**CONCERN STATEMENT:** (Concern ID: 52625)

Commenters expressed concern that management actions (using helicopters) could put employees at undue risk, and suggested that the opinion from the Office of Aircraft Services be reviewed.

**Representative Quote(s):**

**Corr. ID:** 54

**Representative Quote:** Do not put employees (or contractors) at undue risk by using helicopters over a wilderness area to shoot or capture the goats in an attempt to manage the goats. It was tried in the past and the Office of Aircraft Services stated it was one of the most dangerous operations it had seen in the early 1990's due to the terrain and attempts to capture the goats. Review the report before someone gets injured or killed trying to capture goats.

**Corr. ID:** 54

**Representative Quote:** If the park should decide to proceed with the direct removal of mountain goats, the park needs to strongly look at the previous study by the Office of Aircraft Services that stated the continued live capture program that Olympic National Park was conducting in the late 1980's and early 1990s was an accident waiting to happen. It was not if but when a helicopter accident would occur during the live capture program.

**Impact Topic: Park Management and Operations**

**CONCERN STATEMENT:** (Concern ID: 52626)

One commenter noted that in a time when budgets are declining, the park would be easier to manage when park resources do not need to be committed to protect visitors from mountain goats.

**Representative Quote(s):**

**Corr. ID:** 29

**Representative Quote:** The mountain goat has become a problem for park management at a time when park budgets are declining. All aspects of park management will be more easily managed when this additional concern for visitor safety no longer requires management's resources.

**CONCERN STATEMENT:** (Concern ID: 52627)

One commenter requested that the plan/EIS analyze the costs associated with each alternative considered.

**Representative Quote(s):**

**Corr. ID:** 41

**Representative Quote:** Park Operations: Please include explicit budget information about the costs of each of the alternatives considered.

**Purpose And Need: Planning Process And Policy**

**CONCERN STATEMENT:** (Concern ID: 52628)

Commenters stated that the presence of mountain goats in the park is contrary to the NPS mission and mandate because mountain goats are an exotic species, and their removal is consistent with NPS mandates and associated Executive Orders.

One commenter noted that the issue is not about the ecological effect of mountain goats in the park but is about whether mountain goats should be in the park at all according to the NPS conservation mandate.

Another commenter stated that wording of the plan/EIS must be consistent with the NPS mission and Executive Order 13112.

**Representative Quote(s):**

**Corr. ID:** 1

**Representative Quote:** The core issue is that mountain goats are exotic to the Olympic Mountains and cause considerable risk and damage to endemic and other native plant species. In this regard, although arguably charismatic, mountain goats are little more than introduced weeds to Olympic's subalpine/alpine ecosystem. And as weeds, their continued presence in Olympic National Park clearly runs contrary to the NPS's mission.

**Corr. ID:** 51

**Representative Quote:** The NPS mandate for conservation requires adherence to ecological integrity, as a higher priority than the mandate for human enjoyment. In 1916 we had less knowledge of ecological science. The issue is not the degree of impact of this species in Olympic NP, but its presence in this park. The issue should not be construed as competing human values. That is an inherently arbitrary standard. The issue is not the ecological effect of this species in the park. The issue is whether it should be in the park.

**Corr. ID:** 60

**Representative Quote:** We understand that goat management in ONP is required by Executive Order 13112 (i) and appreciate the Park Service taking the lead on this issue. Our society's mission is consistent with the National Park mission to preserve "unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations"(ii). We appreciate the chance to work together on this important issue.

**Corr. ID:** 60

**Representative Quote:** Brackets indicate recommended [removals]and stars indicate \*recommended additions\*.

Page 2: Purpose of and Need for Taking Action - Need for Taking Action:

Based on NPS policy, the park needs to manage exotic mountain goats to:

1. [reduce] \*Eliminate\* their interference with natural processes, native species and natural habitats

and

2. [reduce] \*Eliminate\* the potential hazards mountain goats pose to public safety.

WNPS comment: Mountain goats are an introduced exotic species that threaten park resources and visitors. Many special-category native plants (species which are sensitive, rare, or endemic) are at risk from these introduced animals. WNPS proposed wording is consistent with the National Park mission to preserve natural resources unimpaired for this and future generations and with Executive Order 13112.

**CONCERN STATEMENT:** (Concern ID: 52629)

One commenter suggested that the plan/EIS should clarify the park's management obligations based on relevant laws and policies and that it should examine the effectiveness of NPS management approaches at other national parks dealing with exotic wildlife removal.

**Representative Quote(s):**

**Corr. ID:** 72

**Representative Quote:** The plan should clarify the park's management obligations regarding non-native wildlife in light of the 1916 Organic Act, the 1964 Wilderness Act, current NPS management policies, Olympic's 2008 general management plan, and NEPA. It should examine the various approaches and effectiveness of other national park efforts to deal with exotic wildlife. Hawaii Volcanoes, Haleakala, Channel Islands, Rocky Mountain, Death Valley, Grand Canyon, Great Smoky Mountains, Yellowstone, and Big Bend among other parks have embarked on alien wildlife removals. Many if not most have been successful. What can Olympic learn from those efforts?

**Purpose And Need: Park Purpose And Significance**

**CONCERN STATEMENT:** (Concern ID: 52631)

Referring to the park's Biosphere Reserve and World Heritage designations, one commenter stated that it is the park's responsibility to protect this recognition.

**Representative Quote(s):**

**Corr. ID:** 52

**Representative Quote:** NPCA supports strong protection of Olympic National Park's Biosphere Reserve and World Natural Heritage designations and supports any and all actions that are needed to protect this recognition.

**Purpose And Need: Purpose and Need for Taking Action**

**CONCERN STATEMENT:** (Concern ID: 52634)

Commenters stated that the projected 5% annual growth rate of the mountain goat population demands action.

**Representative Quote(s):**

**Corr. ID:** 61

**Representative Quote:** We agree with the meeting's conclusions that the Mountain Goats in ONP require a comprehensive management plan. The projection of a 5% annual growth of Goat numbers, and the forecast of increasingly mild winters, demands timely, planned, science based, action.

**Corr. ID:** 72

**Representative Quote:** The 5% annual increase in goat population since 2011 and the increasing impacts of non-native goats on alpine and sub-alpine plant communities, wildlife populations, soils, ecological processes, and visitor safety make this a critical and timely issue.

**CONCERN STATEMENT:** (Concern ID: 52635)

Commenters stated that the scope of the plan/EIS must recognize that anything short of total elimination of mountain goats would irreversibly impact the values for which the park was created.

**Representative Quote(s):**

**Corr. ID:** 69

**Representative Quote:** As you scope the management plan for the exotic mountain goat population, you must do so with the clear realization that any objective short of elimination of the entire population from the entire Olympic Peninsula will severely and irreversibly impact the values for which the Park was created.

### ***Purpose And Need: Issues and Impact Topics***

**CONCERN STATEMENT:** (Concern ID: 52637)

One commenter provided suggestions for specific language revisions and additions to the issues and impact topics section of the public scoping materials.

**Representative Quote(s):**

**Corr. ID:** 60

**Representative Quote:** Brackets indicate recommended [removals] and stars indicate \*recommended additions\*.

Page 7: Issues/Possible issues which may be associated with this plan:

New Bullet - \*Popular concern over methods to remove the mountain goats.\*

WNPS comment:

Recognizing that removal may cause popular concern is necessary to ensure NPS has adequate preparation time for informing and educating park employees and the public.

**Corr. ID:** 60

**Representative Quote:** Brackets indicate recommended [removals] and stars indicate \*recommended additions\*.

Page 7: Issues/Possible issues which may be associated with this plan:

Bullet - As the goat population [increases] \*persists\*, risks of local extinction to rare and/or endemic (only found locally) plants is certain [could increase] \*is certain\*.

WNPS comment:

Risks from goat activity to rare/endemic plants are evident at the current goat population levels. As long as the goats remain, each day brings the potential for their extinction. If the goats remain, sooner or later the plants will be lost.

**Corr. ID:** 60

**Representative Quote:** Brackets indicate recommended [removals] and stars indicate \*recommended additions\*.

Page 7: Issues/Possible issues which may be associated with this plan:

New Bullet - \*Loss of the long tradition of studying rare native plants in their native habitats known as botanizing.\*

WNPS comment:

Loss of endemic plants will result in the reduction of quality of botanizing in the park.

**Corr. ID:** 60

**Representative Quote:** Brackets indicate recommended [removals] and stars indicate \*recommended additions\*.

Page 8: Impact Topics - Initial list of impact topics to be considered in this plan/EIS

New Bullet - \*Botanizing\*

WNPS comment: Olympic National Park's endemic plant species provide an opportunity for on-site study of rare plant species in their native habitats that is not found anywhere else in the world.

WNPS supports including the other NPS proposed impact topics.

### ***Purpose And Need: Objectives In Taking Action***

#### ***CONCERN STATEMENT:*** (Concern ID: 52638)

One commenter provided a suggestion for a specific language revision to the stated plan objectives.

***Representative Quote(s):***

**Corr. ID:** 60

**Representative Quote:** Brackets indicate recommended [removals] and stars indicate \*recommended additions\*.

Page 3: Plan Objectives:

[reduce] \*Eliminate\* the potential for visitor safety issues associated with mountain goats in the park.

WNPS comment: As above. WNPS fully supports the other Plan Objectives.

#### ***CONCERN STATEMENT:*** (Concern ID: 52640)

One commenter stated support for the plan/EIS objectives, including the objective to "further public understanding of the Olympics alpine ecosystem and native species and the ecology and conservation of mountain goats in their native range."

***Representative Quote(s):***

**Corr. ID:** 72

**Representative Quote:** OPA concurs with the plan's stated objectives, particularly the need to "Further public understanding of the Olympic's alpine ecosystems and native species and the ecology and conservation of mountain goats in their native range." Your earlier draft plan and EIS (1994) put forth a sound analysis and workable preferred alternative, but it was abandoned due to misunderstandings and misinformation regarding exotic goats and their impacts on park resources. We hope educational efforts are mounted during this round of planning to insure the current plan does not succumb to similar misunderstands.

### ***Suggested References***

#### ***CONCERN STATEMENT:*** (Concern ID: 52641)

Several commenters provided possible references to be used in the plan/EIS.

***Representative Quote(s):***

**Corr. ID:** 54

**Representative Quote:** Do not put employees (or contractors) at undue risk by using helicopters over a wilderness area to shoot or capture the goats in an attempt to manage the goats. It was tried in the past and the Office of Aircraft Services stated it was one of the most dangerous operations it had seen in the early 1990's due to the terrain and attempts to capture the goats. Review the report before someone gets injured or killed trying to capture goats.

**Corr. ID:** 61

**Representative Quote:** Most convincing was An Analysis of the Mountain Goat Issue in Olympic National Park prepared by Olympic Park Associates (OPA) in 1995. We believe the conservation and protection of ONPs alpine vegetation and habitats are essential to providing sufficient sustainable alpine niches for resident and migratory birds, several of which are protected or endangered. We recommend that the data in OPA's analysis be included in the eventually developed ONP Goat Management Plan.

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## **APPENDIX A: CORRESPONDENCE LIST**

[Appendix included in PDF version.]

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**Correspondence ID:** [REDACTED] **Project:** 49246 **Document:** 58823

**Received:** Jul,21,2014 12:31:42

**Correspondence Type:** Web Form

**Correspondence:** Thanks for the opportunity to offer initial comments as the NPS prepares an EIS for a mountain goat management plan in Olympic National Park. The core issue is that mountain goats are exotic to the Olympic Mountains and cause considerable risk and damage to endemic and other native plant species. In this regard, although arguably charismatic, mountain goats are little more than introduced weeds to Olympic's subalpine/alpine ecosystem. And as weeds, their continued presence in Olympic National Park clearly runs contrary to the NPS's mission.

Although fraught with difficulties in the past, it would be my preference to relocate most goats in the Olympic Mountains to the Cascade Mountains, where they are native and herds in some locations (e.g., Glacier Peak) might benefit from augmentation. For those goats that can't be relocated, or if relocation isn't feasible, then they should be eliminated entirely from the Olympics by shooting them (presumably by federal wildlife officers). The resulting meat could perhaps then be provided to food banks or tribes on the peninsula. Of importance in this regard is coordination with Olympic National Forest, which of course has a sizable goat herd in the Mt. Ellinor area.

With the reintroduction of the fisher over the past few years, federal agencies have almost gotten it right with regard to managing and perpetuating the full suite of pre-Euro settlement, terrestrial wildlife in the Olympics. As I see it, speaking as someone who has actively explored and informally studied the Olympic backcountry for nearly two decades, there are two remaining tasks to be carried out: 1) reintroduction of the gray wolf and 2) elimination of the mountain goat. I applaud ongoing NPS efforts in this direction.

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**Correspondence ID:** [REDACTED] **Project:** 49246 **Document:** 58823

**Received:** Jul,21,2014 14:55:59

**Correspondence Type:** Web Form

**Correspondence:** As someone who has spent the last 40 years hiking in the Olympic Mts almost exclusively, I have witnessed the damaged to the environment that the goats can and have done. They should be removed or sterilized and allowed to die out. I do remember that the removal process has historically not been successful, but the problem must be dealt with.

---

**Correspondence ID:** [REDACTED] **Project:** 49246 **Document:** 58823

**Received:** Jul,21,2014 16:05:51

**Correspondence Type:** Web Form

**Correspondence:** I hope you will consider wolf reintroduction as part of your goat management plan. Given that goats in the Olympics seem to rebound after some culling, wolves may help human efforts to keep the goat populations low enough to minimize damage. Wolves would also help keep elk and deer on the move and reduce their impact on riparian vegetation that benefits salmon, steelhead, and bull trout. Thanks for your consideration.

---

**Correspondence ID:** [REDACTED] **Project:** 49246 **Document:** 58823

**Received:** Jul,21,2014 16:48:32

**Correspondence Type:** Web Form

**Correspondence:** Mountain goats have no place in the Olympic mountain ecosystem. It was a mistake to bring them into the region in the first place and it is a mistake to continue to allow them to degrade sensitive habitats and put park visitors at risk. Every attempt should be made to completely remove mountain goats from not just the park, but every part of the Olympic peninsula to ensure that they can't reestablish their population.

Translocation should be used only where feasible and ecologically sensible. Too often, translocation efforts are expensive, labor-intensive, and inhumane, resulting in increased stress and likelihood of mortality in both the captured animal and the receiving population. Therefore, if this method is used at all, it should be in a limited capacity - strictly where it makes ecological and economical sense.

Lethal removal should be the primary management strategy to make the best use of limited resources and have the highest likelihood of long-term success.

While lethal removal can often be met with popular disapproval, it may be possible to increase public buy-in if perceived direct benefit can be maximized. For example, if very limited hunts through the WA Department of Fish & Wildlife Master Hunter Program (no affiliation) were allowed and all meat was required to be donated to local area food banks.

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**Correspondence ID:** [REDACTED] **Project:** 49246 **Document:** 58823

**Received:** Jul,21,2014 20:11:08

**Correspondence Type:** Web Form

**Correspondence:** The goats are not native and are destroying delicate native vegetation. They are also a threat to the public visiting the park and their population is growing quickly. They need to be completely removed from the park by any means

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**Correspondence ID:** [REDACTED] **Project:** 49246 **Document:** 58823

**Received:** Jul,21,2014 20:52:39

**Correspondence Type:** Web Form

**Correspondence:** I would like to see all the goats taken out of this park. We have seen the damage they do to the native plants in the high country. And we have had our own bad experiences with a number of goats through the years. They do not back down and they are no longer afraid of people. We ran into the goat that killed Mr. Boardman the weekend before that tragic event, and he was very aggressive. They do not belong up here, it should be done in a humane way, but I feel any means would be acceptable. I am very glad that you are addressing this issue, it is long over due. Thank you.

---

**Correspondence ID:** 7 **Project:** 49246 **Document:** 58823  
[REDACTED]  
**Received:** Jul,21,2014 21:51:08  
**Correspondence Type:** Web Form  
**Correspondence:** They are not native to the Olympics.

The human population ignores Park and Forest Service guidance on not feeding them, or encouraging their dependence upon humans for handouts. I just witnessed this 13 July on Mount Ellinor listening to a couple of people lament that there were not goats to see, touch, photograph, and feed treats to. The goats will be back to harass people. so send them back to where their ancestors came from.

If that is not cost effective, I know a cook from Nepal in Poulsbo who makes great goat curry.

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**Correspondence ID:** 8 **Project:** 49246 **Document:** 58823  
[REDACTED]  
**Received:** Jul,22,2014 07:39:38  
**Correspondence Type:** Web Form

**Correspondence:** I used to live in the Wood River Valley of Idaho and would spend long periods of time hiking the backcountry of the Sawtooth, Pioneer, and Boulder mountains looking for Goats. They are one of my favorite species, and I find them the greatest survivors on the planet.. I always think the population of goats in that part of the country is too low, and that the populations that do exist need genetic rescue. Over hunting really crippled the populations to where they have never recovered. Idaho's estimated population of Mountain Goats to be under 3000, and surely that number sounds too unsustainably low, considering the size and terrain of the state. Perhaps a great solution to this problem is to capture a good number of the goats in the Olympics, and transfer them to areas of the Rockies where their numbers have declined, or are just hanging on by a thread. For example, they have been eliminated in the Lost River Range, which is Idaho's highest range. Idaho Fish and Game promotes recovery, but nothing really happens. This would be a great chance to reintroduce them there. I'm sure there could be funding in place by some non-profits to help with the transfer, quarantine, and rerelease.

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**Correspondence ID:** 9 **Project:** 49246 **Document:** 58823  
[REDACTED]  
**Received:** Jul,22,2014 08:09:00  
**Correspondence Type:** Web Form

**Correspondence:** Although I have always been supportive of expanding wilderness. it will be difficult for me to support current efforts to give NPS more land to manage on the Olympic Peninsula as long as NPS continues to demonstrate an inability to manage what they are already charged with managing by enabling the proliferation of an invasive species as destructive as the goats.

Just as New Zealand purged their mountains of many hoofed invasive species, NPS needs to relocate all of the goats to locations where they are native, or destroy the animals.

There are many opportunities for park and wilderness visitors to view goats in their native habitats in the Cascades and Rocky Mountains.

Respectfully submitted by [REDACTED], Port Angeles.

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**Correspondence ID:** 10 **Project:** 49246 **Document:** 58823  
[REDACTED]  
**Received:** Jul,22,2014 10:33:10  
**Correspondence Type:** Web Form  
**Correspondence:** There is only one lasting solution to the goat problem:TOTAL REMOVAL weather their relocated or killed is the only answer.

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**Correspondence ID:** 11 **Project:** 49246 **Document:** 58823  
[REDACTED]  
**Received:** Jul,22,2014 11:08:45  
**Correspondence Type:** Web Form  
**Correspondence:** Get rid of the goats.

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**Correspondence ID:** 12 **Project:** 49246 **Document:** 58823  
[REDACTED]  
**Received:** Jul,22,2014 11:31:56  
**Correspondence Type:** Web Form

**Correspondence:** I heartily endorse any plan to reduce/remove the mountain goat population from the Olympic Peninsula. Although I find it thrilling to spot wildlife while on the trail I don't think it's worth it when said wildlife are not native and are capable of destroying the native vegetation. The combination of perceived docility and possible life-threatening aggression are a bad duo to which to expose the visiting public. Despite the signage at trailheads there is a tendency of people to shrug off the negative possibilities and to approach the goats too closely which either puts them at risk or habituates the goats to human presence and puts other people at risk. I don't like the unpredictability of a goat's behavior. Will it ignore me, bully me, or try to start a head-butting fight? It is difficult, if not impossible, to gauge what small action will direct their thinking.

I support relocation to the Cascades, lethal removal of aggressive individuals,and increased nuisance control. I also wonder at the possibility of neutering the males in order to stop the expansion of the herd and allow the population to die out over time.

---

**Correspondence ID:** 13 **Project:** 49246 **Document:** 58823  
[REDACTED]  
**Received:** Jul,22,2014 18:13:12

**Correspondence Type:** Web Form

**Correspondence:** Would offering a hunt result in less cost and more sporting opportunities?

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**Correspondence ID:** 14 **Project:** 49246 **Document:** 58823

**Received:** Jul,22,2014 19:48:20

**Correspondence Type:** Web Form

**Correspondence:** Considering these mountain goats are not native to the Olympic mountain range, they should be removed entirely as they are not only a menace to public safety, but to native plant species and habitat as well. In my opinion, the best and most effective means for this to be achieved would be to use 'lethal measures', as it was put in the information provided by the National Park Service website. Said lethal measures should be in the form of one or both of two options: 1) conduct a lottery for hunting tags which would allow hunters to go in and remove only the mountain goats, or 2) send in "Wildlife Services", or park rangers, to shoot the mountain goats and remove them. Any means used to deal with the mountain goats should most definitely be humane, so UNDER NO CIRCUMSTANCES should poison, traps, aerial gunning or hunting with dogs be allowed to be used.

Thank you for providing me the opportunity to comment on this issue.

---

**Correspondence ID:** 15 **Project:** 49246 **Document:** 58823

**Received:** Jul,23,2014 09:21:01

**Correspondence Type:** Web Form

**Correspondence:** I have enjoyed seeing the goats from a distance, however quite concerned about future safety of unaware folks. I saw tourists taking photos of a mother and baby goat within about 12 feet (with a Ranger nearby and no warnings given!) Have you considered salt licks far from trails? Transporting some of them to the Cascades also seems a good choice. I do not advocate total elimination. What is wilderness without wildlife? In fact, I do hope for the reintroduction of wolves. Thank you.

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**Correspondence ID:** 16 **Project:** 49246 **Document:** 58823

**Received:** Jul,24,2014 18:48:53

**Correspondence Type:** Web Form

**Correspondence:** I would suggest the Park place salt licks (like the ones farmers use for livestock out on the range) in the Park away from the trails that hikers use during summer months. This would keep the goats from following hikers to obtain salt from human waste and clothing.

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**Correspondence ID:** 17 **Project:** 49246 **Document:** 58823

**Received:** Jul,24,2014 18:52:39

**Correspondence Type:** Web Form

**Correspondence:** Regarding non-native Mountain Goats in Olympic National Park:

Please consider the complete removal of this species from the park. I hope that the E.I.S. will examine this alternative to other, less effective, means of controlling the goat population (such as partial removal, sterilization, application of fertility drugs, castration, etc.), several of which have been attempted in the past with only partial, and very temporary, success.

These goats did not originate in the Olympic Mountains and did not migrate into the area by themselves, either historically or recently. I think most would agree that the goats have a significant impact upon native vegetation in the park; in my opinion, based upon eye-witness experience, this impact is neither beneficial nor benign: it is quite negative for many of the plants (especially the sub-alpine plants) that must grow, mature, and propagate in the very short time between the snows of last Winter and the snows of the coming Winter. Being heavily grazed during this time is not beneficial to the great majority of these plants. I believe that I am understating the damage being done by the goats.

My comment does not address any specific human-goat interactions in the park, but certainly the best way to eliminate negative (or dangerous, potentially lethal) interactions between the goats and hikers, plant enthusiasts, back-country campers, etc., is to eliminate the goats in this geographical area. Again, I hope that the E.I.S. will carefully examine this option, including at least two of the ways ways that it could be effected: (1) relocation of the entire existing goat populations to areas in Washington State (and/or British Columbia, and potentially Alaska) where these animals are native, or (2) lethal removal of all existing Olympic populations (i.e., shoot them).

With the goats gone, I'd encourage bringing back the wolf. Olympic National Park would then, once again, have all of the large mammals who were native to the area before Europeans/Americans arrived, and none of the large mammals who were introduced later (for purposes like hunting, in the case of the mountain goats, who now roam where hunting is no longer allowed). It's really time for the goats to go.

Thank you for the opportunity to comment on this important issue.

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**Correspondence ID:** 18 **Project:** 49246 **Document:** 58823

**Received:** Jul,25,2014 01:34:44

**Correspondence Type:** Web Form

**Correspondence:** I support removing the goats from Olympic National Park. Considering that the goats are not native to the peninsula and that they can have an impact on alpine plants, especially endemics, I see no reason to maintain the population. I also was a friend of Bob Boardman who was killed by a goat so I wonder if the situation could repeat itself with all the hikers in the park. I support any way to reduce or completely take out the population including opening the goats up to hunting.

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**Correspondence ID:** 19 **Project:** 49246 **Document:** 58823

**Received:** Jul,26,2014 21:36:23

**Correspondence Type:** Web Form

**Correspondence:** As an avid hiker in the Olympic National Park, I feel that all the goats should be removed. I hiked Hurricane Hill last month and a large male goat followed us up the trail. It was a part of the trail where we could not move out of its way quickly...there was a steep drop on one side and a steep hill on the other. We felt vulnerable and scared, and it was impossible to keep the recommended 50 yard distance from the goat. He came within a few feet of us. Fortunately nothing bad happened, but it felt quite dangerous. He was not at all intimidated by people.

I would feel much safer hiking if the goats were completely removed and put back into the ecosystem where their ancestors came from--was it Alaska? It would be most compassionate if the current family and social groups could stay intact, to lessen the stress of the displacement.

Because the goats are not native to the park, I feel they don't really belong here. I would hate for another tragedy to occur.

thank you

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**Correspondence ID:** 20 **Project:** 49246 **Document:** 58823

**Received:** Jul,28,2014 12:22:37

**Correspondence Type:** Web Form

**Correspondence:** I believe that the National Parks should remain wild! Increase the education to the visitors about the risks involved with goat encounters. If there is a particular Goat that proves that it is a threat, then destroy the animal as you would a problem Bear or Cougar or any other dangerous animal. Please do not try to eradicate the Goat population in the Olympics as they greatly add to the whole Wilderness experience on many levels!

Thank you,

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**Correspondence ID:** 21 **Project:** 49246 **Document:** 58823

**Received:** Jul,29,2014 11:35:33

**Correspondence Type:** Web Form

**Correspondence:** The goats can either be moved or killed, the latter of which isn't the best choice. The two common Locations we meet them are at Klahani & Hurricane Ridges. These are both frequently visited. That is why doing nothing is not really a good Option anymore. Let one death be enough to cause action!

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**Correspondence ID:** 22 **Project:** 49246 **Document:** 58823

**Received:** Aug,04,2014 19:19:06

**Correspondence Type:** Web Form

**Correspondence:** Unless the mountain goats are creating a problem un-natural to the Olympic National Park, other than "defending it's territory from intruders, accidental in nature or otherwise", then nothing should be done about them.

They are creatures living in as near normal environs as they can. Human traffic should be wise enough not to interfere with the goats or any other species capable of causing said humans harm. Humans are the interlopers and should take care NOT to interfere with nature's process.

Question: Would you kill all mushrooms that are harmful to man because a human elected to eat one and died?

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**Correspondence ID:** 23 **Project:** 49246 **Document:** 58823

**Received:** Aug,08,2014 18:17:47

**Correspondence Type:** Web Form

**Correspondence:** I hike the Olympics and in the last two years I have had serious run ins with the goats and the run ins are getting more frequent. They are totally unafraid of humans and once I saw two misguided hikers actually feeding them. I have seen them up close and they have fearsome capabilities. There are an evasive specie and any plan should have as its goal their elimination from the Olympics.

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**Correspondence ID:** 24 **Project:** 49246 **Document:** 58823

**Received:** Aug,10,2014 06:31:36

**Correspondence Type:** Web Form

**Correspondence:** When the term "non-native" is used it means killing them is the method that will be used. But, the park's management is really good at killing the wildlife in the park already and that would be the most preferred by them.

They have already done a good job of killing off hundreds of American Dippers, so this should be an easy step for them. The management at this park killing wildlife is their best solution for every problem. They think because dippers eat salmon eggs and fry they need to reduce the number of birds in the park. It is shameful what they have done to the American Dipper.

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**Correspondence ID:** 25 **Project:** 49246 **Document:** 58823

**Received:** Aug,11,2014 10:52:58

**Correspondence Type:** Web Form

**Correspondence:** As the goats are not native to the Olympics/Olympic National Park, and were brought here as big game to hunt, my vote is to eliminate them from the park.

There are several ways in which this could be done.

1. Capture and remove all the males from the population. They could be placed in a area that is suffering from depletion due to lack of genetic diversity.
2. Capture and castrate all the males within the population.
3. Bring in professional sharpshooters/sheep-goat hunters and kill all the males in the population.

It seems our goats are not that difficult to entice and capture. As they wander right up to the crowd on a nice evening at Hurricane Hill. They have become quite acclimated and comfortable with the human presence. Part of the problem with reducing the human contact is the goats really have no place to go. We have trails and access to the highest points, and they have no escape, i.e. going higher and farther, out of reach. Which is a option for them in other ranges.

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**Correspondence ID:** 26 **Project:** 49246 **Document:** 58823

**Received:** [REDACTED]  
Aug,13,2014 09:19:02

**Correspondence Type:** Web Form

**Correspondence:** The no action alternative is not appropriate. Most mountain goat presence and impacts are in designated wilderness areas. Management of this wilderness should include removal of non-native species. In this case, the non-native species is 1) destructive of fragile habitat, which is highly susceptible to climate change impacts, and 2) a risk to human life.

Nuisance control absolutely should be implemented at areas where concentrations of goats and humans have been identified.

Translocation is a win-win option that should explored in detail, including risk of spreading diseases between populations. This analysis should also include cost-benefit and level of effort analysis. What techniques and technology are required, have these techniques been successful in the past in Olympic NP, how many person-hours, and dollars would be required. This may be a viable option for a portion of the goat population or from specific areas.

I strongly recommend and support removal through killing. Develop a strategy to define target areas, close the areas to humans for short periods, shoot the goats and haul out or bury the carcasses. Surely, there are lethal control examples from other NPS sites. A rifle shot can be a humane and quick way of killing an animal. Alternative techniques, such as poisons in salt blocks or darts with drugs, must exist.

I believe the NPS should have taken stronger action on the goats many, many years ago. The wrath of animal rights groups should not guide NPS management decisions.

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**Correspondence ID:** 27 **Project:** 49246 **Document:** 58823

**Received:** [REDACTED]  
Aug,13,2014 15:19:59

**Correspondence Type:** Web Form

**Correspondence:** I think the Park is responsible for immediately taking action when an aggressive mountain goat situation is reported. The goats have been in the Park long enough to have become habituated to human presence and in some cases no longer keep their distance. In the instance of the fatal goring a few years ago, the hikers were unable to move to a safe distance as recommended. They were actually stalked by the particular goat. There had been many reports that season. I had seen the posters myself on hikes. In fact, a few days before the fatal incident I was hiking the Hurricane Ridge Trail and noticed that the poster re aggressive goats had been removed. I mistakenly thought that the problem had been dealt with. Not so, even after repeated reports. There must be some kind of protocol put in place to remove an aggressive goat. They are not native to the Park, having been brought in for hunting in the early days. If the number of goats needs thinning, why not sell 5 or so special hunting permits a year, designate an experienced hunting guide to accompany the hunter, and conduct the hunt. A substantial fee could be charged that would go to Park management expenses and be a win/win situation for the Park, the hunters, and most importantly unsuspecting visitors and hikers.

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**Correspondence ID:** 28 **Project:** 49246 **Document:** 58823

**Received:** [REDACTED]  
Aug,17,2014 10:35:59

**Correspondence Type:** Web Form

**Correspondence:** Given that mountain goats are not native to the park and there are a number of endemic plants that are, I urge the park to remove the goat population by any means appropriate. I should say the safety of hikers is also a consideration and because hunting isn't happening the goats will of course be increasingly comfortable around people... including when they are experiencing all the aggression of rut. Personally I witnessed the effect of an old breed of feral goats on Jedidiah Island Park in Canada and it was shocking; the undergrowth was literally gone including salal. I was also aggressed by a buck protecting his harem. But efforts by BC Parks were stymied by a campaign by people who were sentimentally attached to the goats.

If translocation is viable and there are locations in which a native goat population is declining, by all means this can be done. But realistically removing the goat population is going to require shooting at least a proportion of the population I would think. Its unfortunate but the Olympic Park is truly one of the last refuges.

Thank you,  
[REDACTED]

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**Correspondence ID:** 29 **Project:** 49246 **Document:** 58823

**Received:** [REDACTED]  
Aug,17,2014 10:55:16

**Correspondence Type:** Web Form

**Correspondence:** I support extirpation of the mountain goat from the Olympic Peninsula as well as the Olympic National Park for several reasons.

1/ The mountain goat is not a natural element of the ecosystem of the Olympic National Park.

2/ The mountain goat reduces the population of plants found nowhere else on earth except in the Olympic National Park.

3/ Such plants face increased stress due to climate change. Insofar as the mountain goat adds to this stress, these plants will benefit from removal of this introduced herbivore.

4/ The mountain goat is a threat to humans in the park.

5/ The mountain goat has become a problem for park management at a time when park budgets are declining. All aspects of park management will be more easily managed when this additional concern for visitor safety no longer requires management's resources.

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**Correspondence ID:** 30 **Project:** 49246 **Document:** 58823  
**Received:** Aug,17,2014 11:03:44  
**Correspondence Type:** Web Form  
**Correspondence:** Dear Committee,

I believe the Mountain Goats should be removed from the Olympic National Park and areas adjacent. They are non-native and severely impact native plants as I have seen on Jedidiah Island in British Columbia where they have decimated the flora to a degree from which the plants might not recover. The goats are also hazardous to humans as witnessed in the killing of Bob Boardman, a trained nurse who did not survive a goat attack. Many of my friends are hikers and return from overnight and day hikes with stories of goats following them and even sleeping near their tents.

Why wait for other incidents with these goats?

The goats could be hunted and the meat brought out and given to those who process animals or somehow directed to the food banks which can always use meat.

Please remove the mountain goats from the Olympic National Park.

Sincerely,

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**Correspondence ID:** 31 **Project:** 49246 **Document:** 58823  
**Received:** Aug,17,2014 12:03:58  
**Correspondence Type:** Web Form  
**Correspondence:** Although it is true there is no definitive data showing that the mountain goats will cause extirpation of any native plants, there is data documenting their herbivory of endemics *Astragalus australis* var *cottonii*, *Campanula piperi*, *Aster paucicapitatus*, and *Senecio neowebsteri*. And the goat wallows and other habitat degradation are appearing on Klahhane Ridge again -- and no doubt in other alpine habitat in ONP.

The park has a mandate to protect native species and the habitat of those species. For plants that have a growing season of only 6-10 weeks, an introduced herbivore should not be tolerated by the Park.

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**Correspondence ID:** 32 **Project:** 49246 **Document:** 58823  
**Received:** Aug,17,2014 16:32:54  
**Correspondence Type:** Web Form  
**Correspondence:** In view of the fact that the goats are an "invasive" unnatural species to the ONP area with few natural predators to keep their population balanced I would support their removal from the park in any way that would be fiscally feasible, including culling. Anything less and their population would surely rebound requiring this issue to be dealt with again in the near future.

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**Correspondence ID:** 33 **Project:** 49246 **Document:** 58823  
**Received:** Aug,18,2014 12:33:46  
**Correspondence Type:** Web Form  
**Correspondence:** Hello. I strongly recommend removal of all goats in Olympic National Park. This July I hiked solo in late June from Heart of the Hills past Heather Park and up to the Klahane Ridge saddle. I had lots of snow on steep slopes to contend with and challenges staying on route. You can imagine my chagrin when I finally attempt to get out of the snow bowl to 'terra firma' at the saddle to have two billy goats snuffing at me. I had to reroute and it was dicey. I waved my ice axe above my head but they weren't moving. I sat it out, getting quite cold and finally the goats moved just enough out of my way to make me more comfortable so that I could get up (and consequently down, on the switchback trail). I just hiked Mt. Carrie on Aug 10 and as I was coming back on the catwalk there was a goat. I could see the area it had been foraging and it was completely torn up. This goat behaved normally but I wasn't happy to see it after having the very unpleasant encounter earlier in the summer. My family has had two encounters with goats which were nerve wracking. The summer of 2010 along Hurricane Ridge and again in 2011. I understand that there is risk involved in wilderness situations but the packs of goats are large and are consistently interfacing with hikers especially in the Hurricane Ridge area. Relocation and or reducing the numbers just buys a little bit of time. It won't solve the problem.

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**Correspondence ID:** 34 **Project:** 49246 **Document:** 58823  
**Received:** Aug,18,2014 18:53:26  
**Correspondence Type:** Web Form

**Correspondence:** It doesn't matter how ONP plans to deal with the goats, opposition will come from the same social element. The park already has a dismal reputation among the local population, so removing the goats in an unpopular manner will not change anything. There is no possibility of pleasing everyone. Remove the goats by the cheapest means possible. Shoot them if it comes to that. Have some guts. Do something decisive.

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**Correspondence ID:** 35 **Project:** 49246 **Document:** 58823

**Received:** [REDACTED]  
Aug,18,2014 19:35:26

**Correspondence Type:** Web Form

**Correspondence:** I feel sorry for the gentleman that got gourd and then died however I feel that more visitor training would have not let this situation evolve the way it did. I understand the people in the wilds need to take a leak every once in a while and there are no port-a-potties and a lot of trees and rocks. I also understand that goats will do what goats will do. They don't have a chance to go to schools for proper training.

The goats should stay in your park!!!!!!!!!!!! Sequim has found a way to control their elk ( I don't agree with the method ) but at least we still have some.

Maybe a little more control of the aggressive ones and some control of the population numbers would be good for both sides.

Please don't take them all.

Thank you for your efforts.

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**Correspondence ID:** 36 **Project:** 49246 **Document:** 58823

**Received:** [REDACTED]  
Aug,20,2014 22:44:14

**Correspondence Type:** Web Form

**Correspondence:** I favor removal of all mountain goats from ONP because they are an exotic species.

They are beautiful animals and always interesting to observe in the wild, but they impact native species of the Park in an adverse way.

In an era of restoring extinct species (e.g., fishers) to the Park, we should at the same time have a strategy to remove exotic species.

The best method of removal would depend on what is safest for personnel involved and what is least traumatic to the animals.

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**Correspondence ID:** 37 **Project:** 49246 **Document:** 58823

**Received:** [REDACTED]  
Aug,22,2014 16:02:04

**Correspondence Type:** Web Form

**Correspondence:** ONP is my favorite park in the world. It is my most frequently destination for hiking, camping and backpacking. I am a landscape painter who paints primarily scenes from the park.

I am a self avowed nature lover and bonafide tree hugger and strongly believe in the preservation of our wild places and the wildlife that inhabit them. I also believe in the humane treatment of animals.

That being said, I think given the non-native status of these animals, and the damage they do to the native alpine plants, and the potential for their populations to grow, that the most sensible solution is lethal removal by skilled back country hunters or rangers. Live removal would be great if it weren't so expensive, and the park is already seriously underfunded.

There are likely avid hunters who would like the opportunity to hunt these animals, and approval by special licensing would be a win-win solution. Approval should be conditional on their ability to minimize impact on the environment and the experience of other park users.

Thank you for receiving my comment.

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**Correspondence ID:** 38 **Project:** 49246 **Document:** 58823

**Received:** [REDACTED]  
Aug,25,2014 14:38:23

**Correspondence Type:** Web Form

**Correspondence:** To whom it may concern:

I think the goats, being a non-native species, should be removed from Olympic National Park. It should be done as quickly and efficiently as possible. If removing specific goats to the Cascades is a priority, then do that, but remove all of them in one way or another.

Also, consider re-introducing wolves to the Park. Being part of the original ecosystem of the Olympics they will help restore the Olympics to their former balance.

The goats have proved to be a nuisance in destroying native vegetation, some of which only exists in this area. They have also proved to be dangerous for people visiting the park. This would not be as big of an issue if the goats were native to the park, but being an introduced species, and introduced originally for hunting, which is no longer allowed in the park, they are not serving a purpose in protecting a place, which I believe is at the heart of why we have National Parks. We are instead paying thousands of dollars to "manage" and essentially protect a non-native species that is hurting the very environment we claim to be protecting. I do not believe this is a wise use of our money. I believe that, in the long run, spending the money to remove every last goat from Olympic National Park would be the most cost effective solution.

Wolves, on the other hand, I believe should be re-introduced to Olympic National Park. They were an integral part of the original ecosystem and they are a key species in the balance of that ecosystem. This has been proven and written about in relation to the re-introduction of wolves to Yellowstone National Park. Please consider re-introducing wolves to Olympic National Park and please remove all the goats.

Thank you.

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**Correspondence ID:** 40 **Project:** 49246 **Document:** 58823

**Received:** Aug.31,2014 14:53:59

**Correspondence Type:** Web Form

**Correspondence:** Please get the goats out of Olympic National Park. They are not native and they destroy sensitive habitat. Their numbers have grown out of control so they are now a danger to the people that use the park. If the park management does not have the courage to get the goats out of the park, maybe the park should introduce wolves into the park. The wolves will reduce the numbers of goats without any assistance from park management.

Thanks.

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**Correspondence ID:** 41 **Project:** 49246 **Document:** 58823

**Received:** Sep.01,2014 11:28:27

**Correspondence Type:** Web Form

**Correspondence:** I understand that the current action is to conduct scoping under NEPA for an Environmental Impact Statement for the mountain goat management plan, and not an opportunity to comment on the management plan itself, nor on the actual management of the goats. With that in mind, and drawing on the proposed elements as listed in the Notice of Intent published in the July 21, 2014 Federal Register, please consider the following comments:

**Natural Processes and Habitats:** please consider how sensitive alpine areas of the park are likely to be affected by the presence of goats in this era of climate change. I do not know the time span you propose for the goat management plan. If it is a short term (say, 5 year, plan) you may think climate change analysis is out-of scope. I would argue that the Park has been studying the effects of goats since at least the 1970s, and that mainstream science shows that the effects of climate change are detectable on the time scale during which you have been studying the goats, therefore I believe it is prudent to analyze the potential effects of goats remaining in the park while native subalpine and alpine species (such as the Olympic marmot and endemic plants) and habitats face increasing pressure from climate change.

**Visitor Safety:** The current management plans relies heavily on visitor education (signs at trailheads). Please consider the potential effects of visitor non-compliance with any goat management plan on the goats, the visitors, and the habitats. Not all visitors read the signs. In many goat-infested areas of the park, people urinating 200 yards from the trail or the campsite is either unsafe or not possible. Especially in the case of campsites, even the most willing-to-comply person who has to pee in the middle of the night is unlikely to travel 200 yards from camp to do so. (And in some areas, if they did, they would likely be within 200 yards of another campsite.) Further, not all visitors will be willing to throw rocks at goats, especially in the presence of other visitors, especially given that many of your visitors have been conditioned to NOT haze the wildlife.

**Vegetation:** Several rare and endemic plant species occur in ONP. Please include a specific analysis of goat predation on these plants.

**Park Operations:** Please include explicit budget information about the costs of each of the alternatives considered.

**Range of alternatives to be considered:**

It is not clear from the scoping notice whether the "lethal removal" alternative refers to occasional removal of individual, habituated, "problem" goats, or whether it includes the broader alternative of eradicating this non-native species from the park. Please consider an "eradication" alternative.

Like any invasive species, the goats do not recognize property boundaries, and management at whatever level is ultimately chosen (eradicate, control, no action) will affect adjacent landowners, and perhaps require cooperation among them. Please include a consideration of what it would mean to cooperate with Olympic National Forest and any private landowners with alpine property on the peninsula to eradicate goats from the entire peninsula, and the ongoing costs of ongoing control for both the Park and adjacent landowners, should an alternative other than eradication be chosen.

Please consider a "goat attraction" alternative. The current goat management plan appendix describes how to deploy a salt lick in order to capture goats; please consider the costs, effects, and logistics of supplying salt in areas that are off-limits to humans, in order to draw the goats away from areas that are heavily used by visitors.

Thank you for the opportunity to comment on scoping. I look forward to reading and commenting on the EIS.

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**Correspondence ID:** 42 **Project:** 49246 **Document:** 58823

**Received:** Sep.04,2014 10:28:19

**Correspondence Type:** Web Form

**Correspondence:** Thank you for this opportunity to comment on the proposal to control the population of feral mountain goats in Olympic National Park.

1. Where native alpine and sub-alpine plant communities have been damaged or altered by goat activity, it will take decades or centuries for even partial recovery, because of the slow growth of these plants and the even slower processes of soil formation. Thus it is important to begin control efforts immediately so as to prevent further damage.
2. Any control program in ONP should be closely coordinated with similar management efforts in the Olympic National Forest, as the lands under the two jurisdictions are closely intertwined.
3. The most effective, and least costly solution to the issue in the short term might be lethal control of their numbers by sharp-shooters, though this would likely arouse sentimental outrage in some members of the public. However, this method is unlikely to eliminate the goat population entirely, and would have to be pursued again whenever goat numbers increase to a point where they damage natural vegetation.
4. The recent experience of managers of the Flinders Ranges National Park of South Australia provides a cautionary tale: A small population of a threatened marsupial species, the yellow-footed rock wallaby, occurs in the Park. Feral goats here, as in several regions of Australia, are damaging and removing vegetation to the extent that native marsupials cannot thrive. Park managers contracted a commercial organization to trap and remove the goats. These people saw a good thing, as they were selling the goats to butchers in ethnic communities where goat flesh is prized, so they always left a small group of mature goats as breeding stock, and in a couple of years they would offer their services again.
5. The mountain goats are able to increase in numbers because of the absence of predators to effectively control them. Washington Department of Fish and

Wildlife's current policy of allowing grey wolves to establish packs in Washington State may provide a solution in the long run. Several people have suggested, that wolves will range into the south Cascades and subsequently on the Olympic peninsula. If the wolves will range to the higher elevations favored by the mountain goats, they may provide a long range, if partial, solution. However, this resembles other efforts at bio-control, introducing a second exotic species to control an established exotic, and the number of cases where it has worked is small.

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**Correspondence ID:** 43 **Project:** 49246 **Document:** 58823

**Received:** Sep,04,2014 22:45:20

**Correspondence Type:** Web Form

**Correspondence:** The overarching fact here is that mountain goats are a non-native species that was introduced into the Olympic Mountains. As a National Park, an International Biosphere Reserve, and a World Heritage Site, Olympic National Park (ONP) is charged with protecting the native species of this place, which includes preservation of their habitat. In May of this year, ONP accepted public comment on its Wilderness Stewardship Plan. Surely the destructive presence of *Oreamnos americanus* is inconsistent with maintaining Wilderness Character in ONP. Through grazing, trampling, and wallowing, mountain goats are degrading habitat and damaging ecosystems in these mountains. Research has demonstrated that even low numbers of mountain goats can cause substantial damage to plant communities. Thus, reducing the numbers of goats in the park is not an adequate solution. The park has programs for lethal removal of non-native plants. It should do the same for non-native mountain goats.

In addition, this destructive non-native animal has killed a hiker on a trail in a heavily-used part of the park. I am witness to the fact that Bob Boardman did nothing to attract or provoke the animal. Now four years later, other mountain goats are intimidating hikers in the same area. If one can visualize a simple set of scales labeled "goats should stay" vs "goats should go", ecological concerns represent a heavy weight on the "goats should go" side of the scales; and the fatal attack by one goat, another big weight on the same side. There is nothing substantial to put on the "goats should stay" side of the scales.

The Draft EIS should address the need for active involvement by both the state of Washington and the US Forest Service in the mountain goat management plan and its implementation. The state has management responsibility for animals on USFS lands. USFS does have responsibility for protection of habitat, which includes plants. Olympic National Forest (ONF) alpine habitat along its border with ONP has large numbers of rare, sensitive, and endemic plant species -- and healthy populations of mountain goats. Lethal removal of goats -- the only real solution to this problem -- will be meaningless unless it is carried out on both sides of the invisible border between ONF and ONP. Oversimplified example: killing all the goats in Upper Royal Basin and Deception Basin won't do the job -- they'll just continue coming over from Mt. Fricaba, Milk Creek, etc.

In the February 1995 Draft EIS, Alternative 1, the proposed action, was the National Park Service's Preferred Alternative: elimination of mountain goats from the park by shooting from helicopters -- lethal removal. ONP arrived at that recommendation based on substantial research compiled in the scientific monograph *Mountain Goats in Olympic National Park: Biology and Management of an Introduced Species*, in which the contributing biologists said: "Our work demonstrated that introduced mountain goats changed the vegetation of the Olympic Mountains." That statement is as true today as it was then.

I propose the following Alternative, which I think should be the National Park Service's Preferred Alternative. It has three parts:

1. Increased Nuisance Control (averse conditioning and lethal removal of habituated mountain goats in high visitor conflict areas).
2. Increased Visitor Education.
3. Lethal Removal to eliminate all mountain goats from Olympic National Park and the contiguous alpine borderlands of Olympic National Forest.

Increased Nuisance Control should begin first, along with intensified Visitor Education. Some visitors are feeding the mountain goats. I believe that explains why the mountain goat initially approached Bob Boardman, Susan Chadd, and me on October 16, 2010. We were sitting quietly eating our lunch. The goat was about 10 feet away, behind us, when we first became aware of it. I think No Feeding should be much more strongly emphasized in Visitor Education materials, including very direct statements about what it can lead to.

The Lethal Removal part of this alternative should also begin as soon as the decision is made. I understand it may take a few years; it may involve shooting both from helicopters and on the ground; and it will have to be coordinated with the USFS and the state of Washington.

Thank you for the opportunity to comment.

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**Correspondence ID:** 44 **Project:** 49246 **Document:** 58823

**Received:** Sep,05,2014 11:19:14

**Correspondence Type:** Web Form

**Correspondence:** There are two issues that need to be addressed in the goat management plan as far as I am concerned.

The mountain goats are not native to the Olympic mountains. They do not belong. They are adversely affecting the native and endemic plants that are here and that the National Park service is supposed to protect. There is no acceptable minimal population.

The protection of the native plant and habitat is in itself the reason to eliminate the goats. The current increase in this nonnative goat population is endangering the safety of the visitors of the park. Those same goats that are degrading the habitat that is requiring protection are becoming aggressive towards people, enough so that I think twice about hiking on certain trails where a goat encounter is likely and the trails are narrow. The aggressive goat at Klahhane that killed Bob Boardman had been there and had been reported as aggressive long before that fatality occurred.

After going to the meeting and hearing how the goat management occurred last time, the herd reduction was difficult; it was more effective in reduction than the actual numbers it took out; that sterilization of animals is not feasible, it still does not make sense, even given the improvements in research and methodology to do it that way again. I am not against the transfer of animals to areas in the Cascades that they could thrive and are short, but the elimination of mountain goats from the Olympic National Park needs to be the objective.

From the past many years of study and observation done on Mountain goats these points seem to remain the same:

1. the effects of mountain goats can be detected even at very low population levels. It is possible to observe trailing, trampling, wallowing, grazing, pellet

groups, etc., even when few animals are present. Thus, there is no minimum acceptable population.

2. To meet NPS and Park management objectives mountain goats must be eliminated, not merely controlled or managed.

3. There are measurable and observable effects, some probably permanent and irreversible, on rare, sensitive, and endemic plants, soils, and native fauna as a result of these introduced animals. There is impairment of the unique resources for which the Park was established. The Park is supposed to vigorously prevent this in fulfilling its stewardship responsibilities.

4. Mountain goats cannot be eliminated from the Park or the Peninsula through live-capture and translocation no matter how efficiently, intensively, or prolonged these operations are conducted.

You could also argue that live capture is inhumane: Animals do feel fear, experience pain, suffer injuries, are traumatized, and often killed. Due to the nature of the habitat mountain goats occupy these unpleasant outcomes are a part of capture. Even the most skillful, well-conducted operation involves a lot of animal pain and suffering. It should be noted that euthanizing unwanted animals through gunshot is considered humane by standards promulgated by the Humane Society of the United States.

5. Reproductive control is not practicable.

6. The Forest Service has to have a management responsibility for protection of the habitat mountain goats occupy. The Buckhorn Wilderness contains areas with more occurrences (number of species) of rare, sensitive, and endemic native plants than anywhere else on the Peninsula.

Thank you for the opportunity to comment, [REDACTED]

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<b>Correspondence ID:</b>	45	<b>Project:</b>	49246	<b>Document:</b>	58823
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[REDACTED]	[REDACTED]
<b>Received:</b>	Sep,05,2014 18:09:12

<b>Correspondence Type:</b>	Web Form
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**Correspondence:** Thank you for undertaking a goat management program. In order to protect the diverse and endemic plant species and communities in the park, I think it is important to remove goats completely from the park. The limited removals undertaken to date do not seem to have reduced the population and goats have become more widespread and aggressive. I would support trapping and relocating ALL goats to the Cascades and other locations where goats are native and in need of supplemental population. If there are too many goats for the relocation opportunities available, I would also support lethal removal via a lottery for a special hunt - - this could also be a way to raise money to manage the removal. Thank you for the opportunity to comment.

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<b>Correspondence ID:</b>	46	<b>Project:</b>	49246	<b>Document:</b>	58823
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[REDACTED]	[REDACTED]
<b>Received:</b>	Sep,05,2014 22:02:53

<b>Correspondence Type:</b>	Web Form
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**Correspondence:** Addendum: In my comments submitted yesterday (9/4/14) I mentioned the mountain goat's approaching us from behind as we sat quietly eating our lunch. Ever since that happened, I have been asking myself, "Why did the goat, a wild animal, approach us?" I think it is an important question. It was not stalking us, as a carnivore might have. The only reason a wild herbivore would approach humans, I think, would be in expectation of getting something it wanted from them. What would this something be? I think the animal had been fed, perhaps something salty. That is why I added a strong education element to my proposed alternative. I think that is very important, and I hope you give my suggestion your full consideration.

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<b>Correspondence ID:</b>	47	<b>Project:</b>	49246	<b>Document:</b>	58823
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[REDACTED]	[REDACTED]
<b>Received:</b>	Sep,07,2014 21:32:30

<b>Correspondence Type:</b>	Web Form
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**Correspondence:** I hope you will consider moving the goats to the Cascades or killing them. They are destroying unique habitat, and they are not native.

While my friend Bob Boardman was killed by a goat, this could have happened in the Cascades or other spots where the goats are indigenous. However, since more aggressive behavior has been noted under the new guidelines (as in the 2011 incident), this makes for a big headache for the park. Trying to just pick out the "aggressive" goats will be difficult and expensive, salt licks will probably be ineffective, and advising people to throw rocks at a goat surely can't be a great idea. Hazing the goats might increase aggression.

The idea of sirens is very depressing. As someone who hikes regularly, I can't imagine going into the wilderness to hear sirens. Since our money is paying for all this, I very much hope you will not implement these ideas.

We have dangerous animals in the parks such as cougars and bears. But they belong here. Please consider removing and/or destroying the goats.

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<b>Correspondence ID:</b>	48	<b>Project:</b>	49246	<b>Document:</b>	58823
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[REDACTED]	[REDACTED]
<b>Received:</b>	Sep,08,2014 21:41:47

<b>Correspondence Type:</b>	Web Form
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**Correspondence:** We have been hiking in the Olympics for sixteen years, at least weekly unless we are traveling. The first few years, the goats had not moved into the Hurricane Ridge and Mount Angeles area. The upper meadows were vibrant with wildflowers and we were never challenged by goats. I thought that I might like to see goats up on these ridges. And then the goats came. How wrong I was. The goats moved in on us when we stopped for lunch on hikes; the meadows became torn-up by goat tracks, dust bowls appeared in sparsely vegetated areas of the ridges, and areas frequented by goats along the trail stank. The death of a fellow hiker convinced me that I could see nothing positive in continuing to allow a non-native species to tear-up the mountain landscape and terrorize people who seek sanctuary in a magnificent National Park.

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<b>Correspondence ID:</b>	49	<b>Project:</b>	49246	<b>Document:</b>	58823
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[REDACTED]	[REDACTED]
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**Received:** Sep,09,2014 12:44:05

**Correspondence Type:** Web Form

**Correspondence:** Completely culling the non-native population of mountain goats is the right thing to do. There are myriad scientifically documented examples of cases in which introduced large herbivores devastate native plant communities and have cascading, negative impacts on wildlife. Easier done now than several decades hence.

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**Correspondence ID:** 50 **Project:** 49246 **Document:** 58823

**Received:** Sep,10,2014 13:52:56

**Correspondence Type:** Web Form

**Correspondence:** Any goats removed from the park, should be done by public hunting, you could require the use of a licensed guide, have a drawing for a tag, require that a kid or nanny be hunted prior to taking a Billy. A good revenue source, good public policy.

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**Correspondence ID:** 51 **Project:** 49246 **Document:** 58823

**Received:** Sep,11,2014 11:27:34

**Correspondence Type:** Web Form

**Correspondence:** Please eradicate this non-native species from the park. I've hiked in the park, and in Glacier National Park where the mountain goat is native. I have a clear emotional appreciation for this charismatic species, but recognize it as odd and foreign in Olympic National Park. The NPS mandate for conservation requires adherence to ecological integrity, as a higher priority than the mandate for human enjoyment. In 1916 we had less knowledge of ecological science. The issue is not the degree of impact of this species in Olympic NP, but its presence in this park. The issue should not be construed as competing human values. That is an inherently arbitrary standard. The issue is not the ecological effect of this species in the park. The issue is whether it should be in the park. Eradicate it, humanely yes to the extent possible. But, eradicate it from the region. It's not natural there. The issue is not political, "just" the consequences of a decision are. For the NPS and the Olympic NP to be most respected and supported, it must continue to make the hard decisions. Eradicating this species from this park is similar to acquiring inholdings and eradicating private buildings in national parks. Don't get lost. Remove this non-native species from Olympic NP. Thank you for your stewardship of our natural landscape.

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**Correspondence ID:** 52 **Project:** 49246 **Document:** 58823

**Received:** Sep,11,2014 00:00:00

**Correspondence Type:** Web Form

**Correspondence:** September 11, 2014

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

Dear Superintendent Creachbaum:

On behalf of the National Parks Conservation Association (NPCA) and our more than 750,000 members and supporters, I respectfully submit the following scoping comments on the Olympic National Park Mountain Goat Management Plan and EIS.

After attending a public scoping open house and reviewing the preliminary alternative concepts, NPCA supports this initial list and looks forward to reviewing the expanded review of these ideas in the Draft EIS. NPCA tentatively supports the Combination of Alternative Concepts by combining elements of the Capture and Translocation and Removal concepts, for the following reasons:

- The No Action Alternative will not improve the current condition in which mountains goats are threatening public and National Park Service (NPS) staff safety. Also, the No Action Alternative will unlikely provide improved natural resource conditions if current strategies of mountain goat management are continued.
- Increased Nuisance Control may reduce human conflicts with mountain goats temporarily and help alleviate negative impacts on natural resources to some degree. The persistence of mountain goats (those not habituated) allowed by this alternative is not a long term solution.
- At this stage in the process, NPCA supports the Combination of Alternative Concepts which combines elements of the Capture and Translocation and Removal concepts. The NPS should strive to remove all exotic mountain goats from Olympic National Park and this is only possible through a combination of capture and lethal removal. Only by removing all mountain goats will natural resource conditions improve, public safety in relation to mountain goats ensured, and a long term solution reached.
- NPCA is interested in the means of capture as well as the locations willing to receive captured mountain goats. Also, our support for lethal removal versus more capture and translocation may be modified depending on the way lethal removal is performed.
- NPCA supports strong protection of Olympic National Park's Biosphere Reserve and World Natural Heritage designations and supports any and all actions that are needed to protect this recognition.

NPCA appreciates the NPS providing preliminary alternative concepts for public review. These initial ideas allow organizations such as NPCA and our members the opportunity to think about this issue in an educated fashion. We look forward to reviewing the DEIS and providing additional comments at that time. Thank you.

Sincerely,

Program Manager, NW Regional Office | National Parks Conservation Association

**Correspondence ID:** 53 **Project:** 49246 **Document:** 58823

**Received:** Sep,14,2014 09:42:16

**Correspondence Type:** Web Form

**Correspondence:** The situations with the goats in Olympic National Park is extremely complex and it is important that this issue is taken seriously. Thank you for giving the public an opportunity to comment. Many of us dearly love Olympic and all it has to offer.

Personally I am willing to give up a "wilderness experience" with goats in exchange for a more truly natural habitat, closer to how it was 100 years ago. Goats were brought here for the intention of hunting on Forest Service grounds. Like many species seeking the best areas to exist, they came to thrive in the park. This was not the intention. Nor was it the intention that they become this huge tourist attraction, becoming what they are now to many people, an animal that many want to get close to and photograph. It is truly AMAZING the human interactions and behavior I have witnessed on the ridge and elsewhere in the the park. People typically want these close encounters and don't always see or process the negative impacts, such as the goats' impact to the plant ecosystem. Keen observers, naturalists, botanists have documented the impact.

As I listened to NPR this morning talk about the Chinook returning to the Elwha I thought about how taking out the dams isn't all that much different than a goat removal project. We have succeeded in putting the Elwha back to how it should be. Many had sentimental feelings about the dams, or enjoyed their recreational experiences on Lake Aldwell and Lake Mills. I sure did. The trade off was far more important to me than my privilege to kayak. Having the river back to how it should be was the right thing to do. I think in this same vein, the removal of the goats from Olympic is also the right thing to do for the true integrity of this place. I have other places to go kayak, just as there are other places where goats thrive in their native habitat.

I could go on and on with how I feel about this. My simple point right now is that if we are working so hard to put Olympic back to its natural state, one in which humans nearly 100 years ago significantly impacted with what they thought were good ideas, then we should do so with the goats as well.

**Correspondence ID:** 54 **Project:** 49246 **Document:** 58823

**Received:** Sep,14,2014 21:54:06

**Correspondence Type:** Web Form

**Correspondence:** I am commenting on this proposed plan as a private citizen of the united states.

I find it interesting that the park is using the fatality caused by a mountain goat as a reason why the mountain goat must be managed, yet the park is also contemplating the reintroduction of the wolf into the park. To date, there has only been one documented case of a human being killed by a mountain goat and at least three cases of wolves causing fatalities in the United States. While tragic, this is an anomaly that occurred.

If the park should decide to proceed with the direct removal of mountain goats, the park needs to strongly look at the previous study by the Office of Aircraft Services that stated the continued live capture program that Olympic National Park was conducting in the late 1980's and early 1990s was an accident waiting to happen. It was not if but when a helicopter accident would occur during the live capture program. It is also interesting that the park states that the goats are affecting the wilderness but most assuredly the park would be using a helicopter to assist in the management of the goat, which also would have an affect on the wilderness.

I would hope that if the park decides to manage goats, that it is without helicopters and is just direct removal by shooting by hunters or park staff. If the concern to manage goats is due to interaction with humans, shoot the goats in the those areas that human interaction is occurring, such as hurricane ridge. Goats in the backcountry will always be an issue due to the USFS not eliminating their goat populations other than the occasional hunter.

While I welcome the management of goats in principle, they will never be fully managed, as the US Forest Service is not eliminating the goats on their lands and this will always pose a problem for park management, as goats from the USFS lands will always wonder onto NPS lands. Whether the goats were naturally occurring at some point or introduced at some point, they are here now and must be looked at from a management standpoint. Do not put employees (or contractors) at undue risk by using helicopters over a wilderness area to shoot or capture the goats in an attempt to manage the goats. It was tried in the past and the Office of Aircraft Services stated it was one of the most dangerous operations it had seen in the early 1990's due to the terrain and attempts to capture the goats. Review the report before someone gets injured or killed trying to capture goats.

**Correspondence ID:** 55 **Project:** 49246 **Document:** 58823

**Received:** Sep,16,2014 11:59:16

**Correspondence Type:** Web Form

**Correspondence:** I have hiked frequently in the Olympic National Park and surrounding Forestry Lands over the past 9 years. I have been in proximity to Mountain Goats once or twice a year in the more recent years. This past summer I noted Goat on a bluff on Mt Townsend, contacted them in the Upper Royal Basin and have seem numerous goats along the Heather Park section of the Lake Angeles Heather park loop trail.

I do respect these goats, enjoy seeing them, however, I do think that their numbers and territory is expanding. They also seem to be getting used to human contact.

I do believe that their numbers need to be controlled for environmental reasons as there are no natural predators. Also, goats which are aggressive need to be removed or terminated.

Respectfully,

**Correspondence ID:** 56 **Project:** 49246 **Document:** 58823

**Received:** Sep,16,2014 14:17:25

**Correspondence Type:** Web Form

**Correspondence:** Considering that the goats are not natural to the region, it would be prudent to the natural state of things to eliminate the goats from the habitat altogether

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**Correspondence ID:** 57 **Project:** 49246 **Document:** 58823

**Received:** Sep,17,2014 12:59:01

**Correspondence Type:** Web Form

**Correspondence:** Thank you for the opportunity to comment on the mountain goat issue. We have lived on the Olympic Peninsula for 12 years, having moved here because of the natural beauty, including the Park. We have made many trips to Hurricane Ridge with friends and family. And we have been a part of the COASST program, doing monthly surveys on the beach just north of the mouth of the Hoh River. So we love and are concerned about the health of the Park.

One of the primary reasons for the creation of national parks is to preserve the pristine natural environment in the protected areas. A major obligation then is to deal effectively with invasive species - - plant or animal. The mountain goats are an invasive species introduced by man and they are doing what invasive species do. With no natural predators, their numbers have increased. They feed on the native plant species and, are a danger to humans.

These problems will not be solved until the goats are removed. While they can be transported to other sites, this is expensive and it seems unlikely that all will be captured, assuring repopulation. Thus, to preserve the natural environment of the Park and to eliminate danger to humans, I strongly urge you to kill all of the goats.

Thank you again for considering my comments

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**Correspondence ID:** 58 **Project:** 49246 **Document:** 58823

**Received:** Sep,17,2014 13:07:30

**Correspondence Type:** Web Form

**Correspondence:** I am concerned about the impact of non-native mountain goats on the ecology of the Olympic National Park, specifically their impact on the native alpine flora. I believe that all of these goats should be removed from the Park. A combination of capture/relocation along with lethal control should be implemented.

The native mountain goat populations in the Washington Cascade Mountain Range are currently adversely affected by geographical isolation, causing negative impacts on the genetic diversity of these populations (lower genetic diversity). It seems possible to me that translocating selected goats from the Olympics to the isolated goat populations in the Cascades could act to increase the genetic diversity of these latter populations. In this manner not all the Olympic goats would have to be removed by lethal means, a plus for the Park in terms of public relations. Rather than viewing the removal in a completely negative light, relocation could be publicized as a positive aspect of Olympic goat removal.

Thank you for considering my comments.

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**Correspondence ID:** 59 **Project:** 49246 **Document:** 58823

**Received:** Sep,17,2014 13:19:44

**Correspondence Type:** Web Form

**Correspondence:** I am a regular backpacker and hiker. I enjoy visiting the Olympic National Park several times each year. I have had run-ins with these goats on several occasions. I witnessed them destroying the vegetation and making a general nuisance of themselves at established camps. They appear to have no fear of humans. In my opinion, these non-native creatures need to be completely removed from the park. They are similar to the wild boars in Hawaii, a bad idea executed by people in a position of ignorance.

This removal should be done with the least risk to human life. If this means hunting them and killing them, then I approve of this method.

Please remove these invasive animals from our Park as soon as possible.

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**Correspondence ID:** 60 **Project:** 49246 **Document:** 58823

**Received:** Sep,17,2014 00:00:00

**Correspondence Type:** Web Form

**Correspondence:** Washington Native Plant Society  
Appreciate, Conserve, and Study Our Native Flora

September 17, 2014  
Superintendent Sarah Creachbaum  
Olympic National Park  
600 East Park Ave.  
Port Angeles, Washington 98362

Also submitted electronically at <http://parkplanning.nps.gov/olyngoat>

Re: Scope - Olympic National Park Mountain Goat Management Plan and EIS

Dear Superintendent Creachbaum,

Thank you for providing this opportunity to comment on the scope of the Olympic National Park (ONP) Mountain Goat Management Plan and Environmental Impact Statement. The Washington Native Plant Society (WNPS) urges the Park Service in partnership with other appropriate agencies to develop a plan that manages the exotic mountain goat population for the protection of the native plants and their habitats within Olympic National Park and the Olympic Peninsula. We believe the only way to accomplish this is through the removal of all goats.

WNPS has a long-term, ongoing interest in this planning; it is our mission to appreciate and protect the native plants of Washington. We advocate for the removal of introduced species that threaten native plants. We understand that goat management in ONP is required by Executive Order 13112 (i) and appreciate the Park Service taking the lead on this issue. Our society's mission is consistent with the National Park mission to preserve "unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations"(ii). We appreciate the chance to work together on this important issue.

Olympic Park's living legacy of endemic and native plants and corresponding habitats is unique and is highly valued by local, regional, and international botanists, citizen scientists, and much of the general public. People around the world appreciate the biodiversity of ONP, confirmed by its recognition as a World Heritage Site and Biosphere status (iii). The Olympic Peninsula Chapter of WNPS promotes the study and conservation of native plants and their habitats on the peninsula. The organization sponsors field trips, surveys, restoration projects, and a variety of educational activities that are open to the public. In July of this year the chapter hosted a Study Weekend at Nature Bridge at Olympic which was attended by society members from throughout Washington. Our members are passionate about native plants.

Studying plants in their native habitats, known as botanizing, is an activity that has a long history. Rooted in the oral traditions of our state's First Peoples (predating the historical record), documented in the journal of botanist and explorer David Douglas, and continuing today on the web with the meticulous records of the Burke Herbarium and the citizen-science compiled WNPS plant lists, botanizing is a discipline worthy of recognition and protection. The observations of botanizers have contributed to the human knowledge base and across cultures for thousands of years.

Washington Native Plant Society members monitor native plants and their habitats. Our members have observed that the activities (cropping and wallowing) of introduced mountain goats disrupt the ecological processes of Olympic National Park and threaten park resources including the park's native and endemic plant species, fungi, and lichens. These observations are consistent with research concluding that mountain goats alter plant community structure, increase bare soil, and pose a risk to rare plant species (iv). UNESCO notes that the mountain goat is the main danger to the integrity of the site(v).

The Washington Native Plant Society believes that the National Park Service is ethically and legally responsible for protecting native bio-diversity within park borders. We have reviewed the initial scoping documents with this perspective in mind and suggest the following changes to ensure that the Olympic National Park Mountain Goat Management Plan meets this standard. Please be sure to read these specific suggestions attached below.

Thank you,

[REDACTED], Conservation Chair  
Washington Native Plant Society

[REDACTED], President  
Washington Native Plant Society

[REDACTED], Conservation Representative  
Olympic Chapter, WNPS

CC: [REDACTED]

WNPS RECOMMENDED CHANGES AND ADDITIONS  
Olympic National Park Mountain Goat Management Plan and EIS

Changes to Document One - Scoping Newsletter: Olympic National Park Mountain Goat Management Plan/EIS  
<http://parkplanning.nps.gov/document.cfm?parkID=329&projectID=49246&documentID=60463>

The following comments are specific to the above NPS document. Brackets indicate recommended [removals] and stars indicate \*recommended additions\*.

Page 2: Purpose of and Need for Taking Action - Need for Taking Action:  
Based on NPS policy, the park needs to manage exotic mountain goats to:

1. [reduce] \*Eliminate\* their interference with natural processes, native species and natural habitats and
2. [reduce] \*Eliminate\* the potential hazards mountain goats pose to public safety.

WNPS comment: Mountain goats are an introduced exotic species that threaten park resources and visitors. Many special-category native plants (species which are sensitive, rare, or endemic) are at risk from these introduced animals. WNPS proposed wording is consistent with the National Park mission to preserve natural resources unimpaired for this and future generations and with Executive Order 13112.

Page 3: Plan Objectives:

[reduce] \*Eliminate\* the potential for visitor safety issues associated with mountain goats in the park.

WNPS comment: As above. WNPS fully supports the other Plan Objectives.

Page 3: Preliminary Alternative Concepts  
\*Reintroduction of native predator species alternative\*

WNPS comment: Some of our members favor the addition of "Reintroduction of Native Predator Species" as an additional Alternative Concept that should be considered as part of the EIS. WNPS appreciates the relevance of the complete list of impact topics proposed by the Park Service and strongly supports the inclusion of those that are directly related to native plants and their habitats.

Changes to Document Two - 2014-07-30\_Olym.pdf: August 2014 Public Scoping Meeting Posters  
<http://parkplanning.nps.gov/document.cfm?parkID=329&projectID=49246&documentID=60827>

The following comments are specific to the above (second) NPS document. Brackets indicate recommended [removals] and stars indicate \*recommended additions\*.

Page 7: Issues/Possible issues which may be associated with this plan:

Bullet - As the goat population [increases] \*persists\*, risks of local extinction to rare and/or endemic (only found locally) plants is certain [could increase] \*is certain\*.

WNPS comment:

Risks from goat activity to rare/endemic plants are evident at the current goat population levels. As long as the goats remain, each day brings the potential for their extinction. If the goats remain, sooner or later the plants will be lost.

New Bullet - \*Loss of the long tradition of studying rare native plants in their native habitats known as botanizing.\*

WNPS comment:

Loss of endemic plants will result in the reduction of quality of botanizing in the park.

New Bullet - \*Popular concern over methods to remove the mountain goats.\*

WNPS comment:

Recognizing that removal may cause popular concern is necessary to ensure NPS has adequate preparation time for informing and educating park employees and the public.

Page 8: Impact Topics - Initial list of impact topics to be considered in this plan/EIS

New Bullet - \*Botanizing\*

WNPS comment: Olympic National Park's endemic plant species provide an opportunity for on-site study of rare plant species in their native habitats that is not found anywhere else in the world. WNPS supports including the other NPS proposed impact topics.

(Citations)

i <http://www.gpo.gov/fdsys/pkg/FR-1999-02-08/pdf/99-3184.pdf>

ii <http://www.nps.gov/aboutus/mission.htm>

iii <http://whc.unesco.org/en/activities/497>

iv WNPS communications and conversations; McNulty, Tim. Olympic National Park, A Natural History. 2009. University of Washington Press.

v <http://whc.unesco.org/en/list/151>

Thank you for considering our comments.

██████████ - Conservation Chair  
Washington Native Plant Society

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**Correspondence ID:** 61      **Project:** 49246      **Document:** 58823

**Received:** Sep,18,2014 00:00:00

**Correspondence Type:** Web Form

**Correspondence:** To: Sarah Creachbaum, Superintendent Olympic National Park

Re: Olympic National Park Mountain Goat Management Plan and EIS

Olympic Peninsula Audubon Society (OPAS) welcomes the opportunity to provide scoping comments on Olympic National Park's Mountain Goat Management Plan. Our Conservation Committee representatives attended a community meeting with an ONP biologist on August 13th. We agree with the meeting's conclusions that the Mountain Goats in ONP require a comprehensive management plan. The projection of a 5% annual growth of Goat numbers, and the forecast of increasingly mild winters, demands timely, planned, science based, action.

We have reviewed the history of the goats in ONP. Most convincing was An Analysis of the Mountain Goat Issue in Olympic National Park prepared by Olympic Park Associates (OPA) in 1995. We believe the conservation and protection of ONP's alpine vegetation and habitats are essential to providing sufficient sustainable alpine niches for resident and migratory birds, several of which are protected or endangered. We recommend that the data in OPA's analysis be included in the eventually developed ONP Goat Management Plan.

OPAS supports the relocation of the Goat population out of ONP and the Olympic Peninsula. We will support a scientific Management Plan that includes public information, education on safe human behavior in areas inhabited by Mountain Goats, problem animal control, animal relocation, and conservation & protection of native vegetation and other wildlife. We are ready to analyze and comment on the draft management plan, as it is prepared. We will also commit to using the communications links within our Chapter of National Audubon Society, and the State of WA, to assist in informing our community about, and supporting the final Management Plan.

Sincerely,

██████████  
Chair, Conservation Committee  
Olympic Peninsula Audubon Society

Cc: Olympic Park Associates (OPA)

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**Correspondence ID:** 62      **Project:** 49246      **Document:** 58823

**Received:** ██████████ Sep,18,2014 11:31:23

**Correspondence Type:** Web Form

**Correspondence:** Dear Superintendent Creachbaum,

Thank you for this opportunity to make comments on the proposed Goat Management Plan and forth coming EIS.

As a supporter of nature's creative process, wilderness and its gifts, I cannot support the maintenance of introduced goats in Olympic National Park.

Being without predators, they reproduce at a rate that despoils the Olympic ecosystem. Their feeding and wallowing destroys unique plants and reduces the food supply for other mammals such as the Olympic Marmot.

Because of our lack of understanding of the consequences, we have introduced rabbits to Australia, starlings to North America, and goats to the Olympics, along with other attempts to provide game animals for sport. Because of this introduction, we have and will spend, time, energy, and money trying to solve the problem the goats are having on the Olympic ecosystem.

One of the gifts of wilderness is it provides protection for the plants and animals that may provide genes for future cures of human disease and other scientific discovery. In the Northwest, we treated the Pacific Yew as a weed tree in our forests. Its bark is now a cure for some forms of cancer. These plants and animals are not just a curiosity for biologists, they could provide future lifesaving resources. Because we are not good predictors of the future, protecting these resources is necessary for our children and their children.

It is my personal hope that the planned EIS will include methods to remove the goats in the park and the peninsula. I would prefer that the goats be transferred to other locations where they are native.

It is also my hope that a plan will also include reintroduction of species that have been removed from the park, like bears and other predators that were originally a part of the Olympic Peninsula ecosystem.

Thank you for this opportunity to comment,

Sincerely, ██████████

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**Correspondence ID:** 63      **Project:** 49246      **Document:** 58823

**Received:** ██████████ Sep,18,2014 14:42:54

**Correspondence Type:** Web Form

**Correspondence:** Olympic National Park is a designated International Biosphere Reserve and a World Heritage Site due, in part, to its rare, sensitive and endemic plants.

The goats on the Olympic Peninsula were introduced and are not native. Their presence continues to damage these plants, associated plant communities, and their habitats.

The proper response to the goat issue is for lethal removal from the park in conjunction with Olympic National Forest to prevent re-introduction. This action would enable Olympic National Park to fulfill its stewardship responsibilities as well as address the human safety issue.

If Olympic National Park had followed through on its 1995 Draft EIS with the Preferred Alternative: lethal removal, an unfortunate death would have been prevented and this whole repeat process would not be necessary.

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**Correspondence ID:** 64      **Project:** 49246      **Document:** 58823

**Received:** ██████████ Sep,18,2014 16:44:54

**Correspondence Type:** Web Form

**Correspondence:** I suggest the "No Action Alternative" for Mountain Goat management. The present population of goats seems sustainable and does not appear to be detrimental to indigenous plants. Many of the areas with a high concentration of goats were study areas where salt blocks were placed, in the past to attract goats for the studies. If the goat population increases past manageable levels, possibly a combination of alternative concepts could be considered such as transplanting them to an area where a healthy goat population could be maintained. There are organizations who have trained volunteers and staff to assist with this process. In 1988, my husband and I talked with the Nevada State Game Department and FNAWS volunteers. They would have brought equipment and personnel to ONP to remove selected goats for transplanting in other mountain ranges. ONP refused the offer stating it was not the park's policy to be a part of the transplant operation. I understand that any animal can become over populated and controls need to be used when there is not enough viable habitat for them. Perhaps you could consider offering limited permits for hunting with the guidance of park rangers.

Park information states that Mountain goats are not native to the park. Since they were brought here and were well established before ONP was established, they should be considered "native". Isn't it the duty of the park system to protect areas and the wildlife within them. Refer to PDN July 8, 2004

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**Correspondence ID:** 65      **Project:** 49246      **Document:** 58823

Received: Sep,18,2014 20:10:11  
Correspondence Type: Web Form  
Correspondence: Please remove all goats from the Olympic National Park & Forest. They are not native; and, they are a danger to native fauna and flora.

We have a very special place here; please help to preserve it.

Sincerely,  
[REDACTED]

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Correspondence ID: 66 Project: 49246 Document: 58823

Received: Sep,18,2014 21:12:56  
Correspondence Type: Web Form

Correspondence: I lived on the Olympic Peninsula for 25 years and am very familiar with the ONP and the mountain goat issue. While I realize that the mountain goats are not native and there is concern for the endemic plant species, I understand that there is no definitive data showing that the mountain goats will cause extirpation of any native plants. I would imagine that if the goats were to cause the extinction of any plant species, they would have done so by now, seeing that they have been in the park for over 90 years.

As for public safety concerns, the 2010 fatal incident was truly tragic and was the action of an habituated goat. Fatal human encounters are very rare. This one attack does not turn mountain goats in general into dangerous animals. This was the first in ONP in over 90 years. With that said, all precautions need to be taken to prevent any future fatal incidents. To achieve this end, I would support the option of Increased Nuisance Control.

If the goal is to return the plant and wildlife populations of the Park to where they were 100 years ago, then the Park must also look at reintroducing species that it chose to exterminate, such as the wolves, which interestingly, were exterminated around the same time the mountain goat was introduced. Perhaps if the goats had a predator like the wolf, their overpopulation and impact on the Park would be less of a problem.

I am firmly against removing all goats through lethal means. I would support the Transfer and Relocation option or the No Action Alternative combined with the Increased Nuisance Control. It seems that Klahane Ridge is one of the more vulnerable places for both humans and the endemics. Perhaps this should be an area of priority control.

Thank you for your consideration.

Sincerely,  
[REDACTED]

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Correspondence ID: 67 Project: 49246 Document: 58823

Received: Sep,18,2014 22:44:39  
Correspondence Type: Web Form

Correspondence: In the 2980's when I was an serving as an officer for my local Audubon Chapter, I was tasked by that membership to write a letter to your office about the Goat Problem in ONP and ask that all the goats be removed or destroyed. You didn't do that. I recall back then it cost over \$500 per animal for the removal and some died in the process - so those expensive few who left ONP are now increasing their numbers in another location. As their population increases, we know they will damage the native vegetation, lurk along hikers' favorite trails to paw the ground using human urine for salt sources, become desensitized to human presence and eventually maim (at least) another hiker or two. The goats are non-native and were introduced for hunting purposes. They are a problem comparable to the wild pigs in Hawaii and elsewhere, and require a large management presence beyond their value to the park. Please pay the hunters to take them out now before they reproduce next year and enlarge their population even more. The goats detract from the park and you don't have enough cougars to predate them.

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Correspondence ID: 68 Project: 49246 Document: 58823

Received: Sep,18,2014 23:51:51  
Correspondence Type: Web Form

Correspondence: Mountain goats are an invasive species in the Olympic National Park and are damaging the land that native plants and animals need to survive. They have proven that they are a deadly threat to ONP visitors. If left unchecked by human intervention the number of mountain goats will likely increase in numbers, especially given milder winters expected due to climate change. The ONP should develop a plan to remove all mountain goats from ONP in as cost effective manner as possible.

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Correspondence ID: 69 Project: 49246 Document: 58823

Received: Sep,19,2014 00:37:15  
Correspondence Type: Web Form

Correspondence: Introduction:

As you scope the management plan for the exotic mountain goat population, you must do so with the clear realization that any objective short of elimination of the entire population from the entire Olympic Peninsula will severely and irreversibly impact the values for which the Park was created. Also, anything short of total elimination will present both an ongoing financial burden to Park budgets, and an ongoing risk of death, injury and intimidation to park visitors. Any alternatives that do not result in total elimination, including the traditional "no action" alternative, must be thoroughly analyzed for these adverse impacts, extending indefinitely into the future.

Given that any retention alternatives, when extended thus into the future, will have astronomical cost and impact. I urge that most of your proposed and evaluated alternatives reflect the variety of methods and scenarios for total elimination. These possibilities are many and varied. The retention alternatives should be included only to the extent necessary to show their prohibitive long-term expense, and more importantly, their ultimate failure to meet Park mandates.

National Parks were established to protect not only what was there, but to protect the parks from what was NOT there. Olympic National Park's high country is what it is partly because there were no mountain goats. We have our own species of Marmot, and don't have the kinds that exist elsewhere. We have our own flowers, our own ecosystems. We don't have Ptarmigans or picas. All these small things combine to make a unique combination.

Allowing the goats to continue their impact at all, much less to again explode their population, is contrary to everything the National Park Service stands for. Over many centuries, the Olympic ecosystem would adjust to the presence of goats, and reach some equilibrium, but it would no longer be the Olympic National Park that was preserved in 1938 for future generations. That park will be gone forever, and there will be a new one, not quite so special and unique.

The implications of my experience of goats in Olympic National Park:

In 1975, as a volunteer in Royal Basin, and for 8 additional seasonal ranger summers in Olympic National Park, one of my significant tasks was to observe and manage goat-human interaction in the backcountry. My initial orientation to this task came from Bruce Moorhead, the Park Biologist, but my most significant education was on-the-job, and lasted many seasons, including the peak of the goat removal project.

What I saw was that, wherever there were goats, even intermittently, human impact was multiplied 4-10 times. A party could camp in an appropriate spot, and leave no trace of their presence, until the goats came in, possibly days later. When the goats found the campsite, they trampled, and excavated for urine and other salt until the site was severely impacted. This paradoxically made it more likely that the site would be used, and impacted more by humans, which would then attract more goat visits. This cycle is quite destructive, and I have not observed it significantly with native animals.

There is a similar cycle that builds trails where native animals and visitors have never made them. Goats are attracted to human destinations, and their travel to them will create trails where none existed before. People will then see and follow these trails when exploring (otherwise) wild places. The human use of these goat trails will then attract more goat travel (in search of salt), and more impact (digging for it), which makes the route even more obvious for people, and so forth.

Many animals make trails that people then follow (especially elk), and following these game trails is a wonderful experience of the wilderness. But with naturally occurring animals, there is no feedback loop as there is with the goats, so there is no additional impact. I have observed this phenomenon around Mount Angeles, and in the basalt ridges in the headwaters of the Dungeness, often adjacent to outcrops of endemic wildflower species, such as Piper Bellflower.

It appears (both from my own observation, and reports of others) that the goat population that is rebuilding after their near-elimination in the 1980s includes a higher proportion of more aggressive goats than previously existed. I theorize that perhaps the removal effort selected for less aggressive goats, leaving the more aggressive ones that were harder to catch as the gene pool for the current population. This kind of selection for "desired" traits is the basis of thousands of years of animal husbandry. Any limited removal or destruction alternative will likely increase this selection for more dangerous goats over the long term.

Also, the present goats appear more likely to be angered by "hazing" actions than in the past. 30 years ago, when you threw a rock at a goat, it usually made a prompt, (but often temporary) retreat, but I never saw one stand its ground or advance, as I have seen recently. It appears that the goats are becoming immune to hazing behaviors, and therefore such efforts are losing their effectiveness, and likely triggering threatening behavior, rather than retreat. This means that the toolbox for managing goats for visitor safety is getting emptier over time, with the result that the goats will become an increasing safety and survival threat to human enjoyment of the wilderness (and maybe to other animals as well...).

The National Park Service's biological, ethical, and public service mandate here is clear. There is nothing about preserving Olympic National Park, or providing for its enjoyment that includes allowing an exotic species to destroy its most unique species, its most sensitive ecosystems, and even kill its visitors.

This isn't like the balance between visitor safety and preservation of grizzlies in Yellowstone, or park wolves and nearby ranch cattle. There is no trade-off between enjoyment and preservation, as there is with so many wilderness issues. Both sides of the balance demand goat removal. National Park wilderness is not the place to provide viewing experiences for animals that do not belong there. That's what zoos are for.

Allowing non-native animals to scare, harm and kill park visitors violates all the National Park and Wilderness values there are.

The most cost-effective way to promote the long-term health of the Olympic Wilderness will be to devote nearly ALL available resources (including political, and interagency) to eliminating the goat population. At this time, there is no more useful, efficient or effective wilderness protection effort than to eliminate the exotic mountain goat population. As long as there is even one breeding pair of exotic mountain goats left in the Olympic Wilderness, all other efforts toward on behalf of the wilderness are relatively wasteful, and will not return as much long term wilderness value as goat elimination.

Finally, this impact statement must propose and evaluate methods for ensuring that a goat population does not remain in the areas outside of Olympic National Park. I know that extraordinary provisions, even legislation, may be necessary to eliminate them from the adjacent National Forest wildernesses, but those areas must be included in the plan as well.

Ideas for how to do it:

1. Sell them: Offer to relocate as many goats as can be sold for the cost of removal. Any zoo, game farm, or other legally entitled entity that can pay the cost of removal should get first chance at goats. At some point, the cost will exceed the demand, and this method will meet its limit. However, its inclusion will be a political benefit. Any group or individual that opposes killing of goats will have the opportunity to buy their clemency.
2. Experimental chemical sterilization by projectile darts: I don't know if such an injectable contraceptive exists, but if goats can be shot from helicopters,

they could also be darted.

3. A special, supervised hunt: Auction off tags for a special goat season. Each tag winner would be escorted by park staff for the entire hunt, to ensure visitor safety, and safety of other wildlife. Starting bids would have to cover this cost. I believe this once in a lifetime opportunity would draw enough paying participants to seriously dent the population, while creating a constituency in favor of this action.

4. Make use of opportunities: Allow any ranger, who is otherwise qualified to carry and use a firearm, to shoot goats whenever conditions are appropriate. (i.e. There is no chance that a missed shot could harm people or wildlife, there is no hazard to the ranger or other people, visitors are either not present, or are supportive of such action, the carcass will not be a problem, etc.)

5. Last: hire skilled professionals to rapidly and humanely shoot any remaining goats from helicopters. Make use of early season concentrations in snow-free portions of high country habitat, both for efficiency, and for minimizing visitor presence.

The most difficult problems are political, not technical or budgetary.

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<b>Correspondence ID:</b>	70	<b>Project:</b>	49246	<b>Document:</b>	58823
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<b>Received:</b>	Sep.19,2014 08:49:46
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<b>Correspondence Type:</b>	Web Form
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**Correspondence:** As a general rule, it seems to me that we try to eliminate invasive organisms that do damage to our land. Think Scotch broom, poison hemlock, tansy ragwort, etc. I realize that animals are in a different category from plants but in this case, the invasive animals are doing significant damage to our park lands. However much I used to like seeing the goats when hiking in the ONP, I am in favor of lethal elimination. Since Boardman's death and since I learned how much damage the goats do to the flora, I don't enjoy seeing them any more. As a hiker and backpacker in the Olympics, I am avoiding the areas that the goats habituate.

With a strong information program including pictures of damaged landscape and stories about people/goat interaction that were not pleasant, you could probably convince the public that mountain goats were not an asset in ONP. You could probably sell hunting licenses to local hunters for a significant sum, but not when there were cute little goats around.

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<b>Correspondence ID:</b>	71	<b>Project:</b>	49246	<b>Document:</b>	58823
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<b>Received:</b>	Sep.19,2014 09:29:12
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<b>Correspondence Type:</b>	Web Form
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**Correspondence:** Thank you for allowing me to voice my opinion. Although I love goats and also love seeing them in the wild, they are an introduced species to the Park and, therefore, do not belong. Here's a solution for keeping them under control: re-introduce wolves back into the Park. They were there before humans (men) eliminated them. They're beautiful, belong there, and would be predators to the goats. We'd still have some goats around but not so many as to overgraze the wilderness or be a threat to humans. Wolves would have enough to eat inside the Park so they wouldn't have the need to go where domestic livestock live.

If we humans are going to "play God" in the wilderness, let's try doing it the "natural" way.  
Thank you.

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<b>Correspondence ID:</b>	72	<b>Project:</b>	49246	<b>Document:</b>	58823
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<b>Received:</b>	Sep.19,2014 00:00:00
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<b>Correspondence Type:</b>	Web Form
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**Correspondence:** Superintendent Sarah Creachbaum  
Olympic National Park  
600 E. Park Avenue  
Port Angeles, WA 98382

Re: Olympic National Park Mountain Goat Management Plan and EIS

OPA is pleased to provide scoping comments on Olympic's Mountain Goat Management Plan. We are heartened to see the park returning to this issue after a 20-year hiatus. The 5% annual increase in goat population since 2011 and the increasing impacts of non-native goats on alpine and sub-alpine plant communities, wildlife populations, soils, ecological processes, and visitor safety make this a critical and timely issue.

#### Plan Objectives

OPA concurs with the plan's stated objectives, particularly the need to "Further public understanding of the Olympic's alpine ecosystems and native species and the ecology and conservation of mountain goats in their native range." Your earlier draft plan and EIS (1994) put forth a sound analysis and workable preferred alternative, but it was abandoned due to misunderstandings and misinformation regarding exotic goats and their impacts on park resources. We hope educational efforts are mounted during this round of planning to insure the current plan does not succumb to similar misunderstands.

#### Global Warming and Goats

With the affects of global warming becoming apparent in Olympic, OPA considers is essential to restore the park's durable ecological communities and processes. As you know, the alpine and sub-alpine plant and animal communities of the Olympics have survived through severe climatic fluctuations of the past two million years and beyond. It is important to note that sub-alpine plants and animals - including five endemic wildlife species (one species, Olympic marmot, and four subspecies) - utilize the same sub-alpine habitats as non-native mountain goats. To our knowledge, these communities have evolved without the presence of large rocky-outcrop herbivores. The unique character of these communities, rich with endemic, near-endemic, rare, and disjunct plant species and associations, may be a direct result of this condition.

The EIS should include a vigorous evaluation of impacts to these species and communities as well as soils, ecological processes, and wilderness character by exotic mountain goats.

## Management Directives and Obligations

The plan should clarify the park's management obligations regarding non-native wildlife in light of the 1916 Organic Act, the 1964 Wilderness Act, current NPS management policies, Olympic's 2008 general management plan, and NEPA. It should examine the various approaches and effectiveness of other national park efforts to deal with exotic wildlife. Hawaii Volcanoes, Haleakala, Channel Islands, Rocky Mountain, Death Valley, Grand Canyon, Great Smoky Mountains, Yellowstone, and Big Bend among other parks have embarked on alien wildlife removals. Many if not most have been successful. What can Olympic learn from those efforts?

## Other Agencies

We are also aware that some mountain goat populations have become threatened in their native habitats in other national parks, national forests, and tribal lands. We urge the park to work closely with these agencies regarding possible relocation of Olympic's goats.

It is important that the park also work with Olympic National Forest and the Washington Department of Fish and Wildlife in an effort to address mountain goat populations adjacent to the park that can act as source populations that can affect various management strategies in ONP.

## Draft Alternative Concepts

OPA appreciates the opportunity to comment on draft alternative concepts during the scoping phase. The six alternatives (No Action, Combination of Alternative Concepts, Increased Nuisance Control, Capture and Translocation, and Removal) broadly cover the options available to park managers. We would suggest other options that involve coordination with other agencies and continual ongoing efforts to address goats migrating into the park. We also recommend an alternative (or part of a preferred alternative) that, short of removal, would at the very least establish permanent goat-free areas in parts of the park that are known to support the largest concentrations of rare and endemic plants such as the north-central, northeast, and eastern alpine areas.

OPA looks forward to working closely with park planners to insure an effective plan and implementation program is put in place to address this long-standing resource problem at Olympic.

Sincerely,

██████████, President

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<b>Correspondence ID:</b>	73	<b>Project:</b>	49246	<b>Document:</b>	58823
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Received:	Sep,19,2014 14:14:16
<b>Correspondence Type:</b>	Web Form

**Correspondence:** The Mountain Goat Management Plan for Olympic National Park must include the research and recommendations that went into the February 1995 Draft EIS, particularly Alternative 1 (the proposed action). Mountain goats were introduced to the Olympic Peninsula to be killed by hunters, but with the establishment of Olympic National Park that was soon prohibited. They have long had a significant impact on fragile plant communities and now, tragically, on visitor safety. Although several hundred goats were removed during the 1980s, the proposed follow-up in the 1995 Draft EIS, Alternative 1, was stopped by Congressman Norm Dicks - not in response to any change in the science, but in response to pressure from animal rights groups who had no interest in nor understanding of the ecology of our National Parks. As a result, goat populations rebounded and impacts increased.

The goats' trampling, consumption of fragile and rare plants, deep and aggressive pawing/digging to create large rutting pits and wallows and intimidate visitors, and other behaviors have resulted in decreased species diversity, erosion, irreversible damage to fragile alpine and subalpine ecosystems, and dangers to Park staff and visitors.

Olympic National Park must fulfill its stewardship mandate and work with the US Forest Service and the State of Washington to remove the goats. Park resources are limited and it's impossible to resolve the "goat issue" through sporadic attempts to scare them away. We cannot allow these strong, well-adapted and increasingly aggressive animals to continue to destroy fragile ecosystems and eventually dominate the Olympic Mountains.

Thank you for the opportunity to comment on this critical issue.

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<b>Correspondence ID:</b>	74	<b>Project:</b>	49246	<b>Document:</b>	58823
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Received:	Sep,19,2014 14:42:45
<b>Correspondence Type:</b>	Web Form

**Correspondence:** The Olympic National Park is well known for its rich variety of wildflowers, including many endemics. These plants developed without the influence of Mountain Goats and can suffer significant negative impacts from the browsing of the goats. The native vegetation needs protection from goats. If such protection requires removal of the goats then I am, somewhat reluctantly, in favor of that action. There are many other places where I can see goats but very few areas where I can see the endemic plants present in the Olympics.

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<b>Correspondence ID:</b>	75	<b>Project:</b>	49246	<b>Document:</b>	58823
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Received:	Jul,31,2014 00:00:00
<b>Correspondence Type:</b>	Letter

**Correspondence:** I ask you to recommend the elimination of all the non-native goats on the Olympic Peninsula. I know it will cause resistance from animal rights people, and I care about animals, but I am more of an environmentalist. They are decimating the environment and must be permanently removed to save what we can of the natural landscape.

Also, I have an experience where I was not aware at the time of the my personal danger. Some years ago I was camped with my friend, a professional photographer, high above Royal Basin. My job was to shoo away the goats from his tripod and his large format camera and to keep the goats out of the

picture. Especially to keep the goats from licking him and his camera lenses. I'm 5'3" and 110 lbs. and didn't know my danger in flapping shirts at them. In the middle of the first night a herd came thundering down on our little tent and split around us just seconds before possibly crushing us. I worked with trepidation through the next day and slept in fear the next night, then was glad to pack up and hike out.

It sounds cruel, but shoot them all and air lift them out to pet food factories.

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**Correspondence ID:** 76 **Project:** 49246 **Document:** 58823  
**Received:** Jul,28,2014 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Hi - I was a W.W.II vet who graduated from Ag. School in 1950. I would like to suggest you drop salt blocks for your goats in more isolated spots as they need salt and that might get them away from humans for salt. Drop salt blocks from a helicopter.

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**Correspondence ID:** 77 **Project:** 49246 **Document:** 58823  
**Received:** Jul,28,2014 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** I just read in our local newspaper the problem you are having with mountain goats. It stated that they are attracted to humans by salt and minerals. May I make a suggestion? Mineral salt is available in 40 lb blocks used by cattle and horse owners. They are mounted on a post or just on the ground. Why not look into placing some of these blocks in areas where the goats move away from human spots. I know this is using an artificial method but they do occur naturally. These blocks are solid and have to be licked. They do not wash away easily. They are usually available at local stores and are not very expensive. It is worth a try - the goats would like it and it would keep them away from camping sites.

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**Correspondence ID:** 78 **Project:** 49246 **Document:** 58823  
**Received:** Jul,28,2014 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Relocate mountain goats to other parks and mountains if they are dangerous. Do not shoot to kill animals. Bears, cougars, wolf, foxes deserve protection!

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**Correspondence ID:** 79 **Project:** 49246 **Document:** 58823  
**Received:** Sep,17,2014 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** Mountain goats were introduced to Olympic National Park by humans. They are not native to the Olympic Peninsula. Their introduction has never been without consequences. Mountain goats are destructive to indigenous native plants and have proven to be a danger to park visitors, at least in part because of their need for, and attraction to, the salt found in humane urine. I believe the National Park Service has an obligation to protect indigenous plants in the park as well as visitor from these introduced (by humans) species of animals. The lack of natural predators, resulting in goat population growth increases the urgency of mountain goat removal. Complete, humane goat removal is likely to be costly in time, effort and expense. Human beings created this problem and human beings need to correct it now.

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**Correspondence ID:** 80 **Project:** 49246 **Document:** 58823  
**Received:** Sep,10,2014 00:00:00  
**Correspondence Type:** Park Form  
**Correspondence:** About the mountain goats: Please re-locate or introduce a native predator (wolves?) to help with balancing the ecosystem. Thanks. Or perhaps allow limited hunting.

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**Correspondence ID:** 81 **Project:** 49246 **Document:** 58823  
**Received:** Sep,16,2014 00:00:00  
**Correspondence Type:** Letter  
**Correspondence:** We have lived in Port Angeles for more than 40 years and have hiked, camped and skied in Olympic National Park countless times. We believe we understand the importance of protecting an ecosystem and understand that accommodations must be made because even the most careful human intrusions have an impact.

But we believe it is past time to take all possible measures to get rid of the goats in Olympic National Park. They never were part of the ecosystem the Park is intended to protect. They are destructive to the native plants.

We are afraid to hike on many of the trails we have enjoyed for so long. We are afraid to take our grandchildren on any of the trails known for having goats.

If the goats had been removed after earlier studies that made clear this needed to be done, the life of Bob Boardman would have been spared as well as the terrible related repercussions for his family, friends and hiking partners.

Further delay seems tantamount to doing nothing if packs of wild dogs were along trails. Non-native species threaten the very reasons for the Park: protection of a natural ecosystem and opportunities for people to have experiences that will enhance their knowledge and lead to appropriate protection for the native species within the Park.

Thank you for considering our comments.

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**Correspondence ID:** 82      **Project:** 49246      **Document:** 58823

**Received:** [REDACTED]  
Aug,13,2014 00:00:00

**Correspondence Type:** Park Form

**Correspondence:** No action alternative.

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**Correspondence ID:** 83      **Project:** 49246      **Document:** 58823

**Received:** [REDACTED]  
Aug,13,2014 00:00:00

**Correspondence Type:** Park Form

**Correspondence:** I think the wild mountain goats should be removed from ONP and sent back to Alaska, which I understand was where the animal originated.

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**Correspondence ID:** 84      **Project:** 49246      **Document:** 58823

**Received:** [REDACTED]  
Aug,13,2014 00:00:00

**Correspondence Type:** Park Form

**Correspondence:** Dear Olympic National Park,

Hi! I am Alyssa but everyone calls me Ally. I am writing to you about your mountain goat problem. From my view I see two reasonable sides. The first one is moving the goats to the native lands and the second one is neutering them. I now there are a few pros and con to each but maybe stay with me, you could combine them why don't you shoot some goats with a birth control pill while you move a few so less babies are born that year and you have a few less. If you repeat the proses for multiple year you could adventaly get rid of all of the goat with all the risk of them dieing while you move them. Your kind of supporter.

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**Correspondence ID:** 85      **Project:** 49246      **Document:** 58823

**Received:** [REDACTED]  
Aug,13,2014 00:00:00

**Correspondence Type:** Park Form

**Correspondence:** Hello, Please choose & implement strategies that remove the goats from ONP, either through non-lethal or lethal means. They have no place in the Park. The ecological impacts are substantial. The personal safety issues is a huge factor to our family. We either avoid known goat areas - such as the switchback trail, my favorite trail in the park, or bring a weapon in case a goat becomes threatening. Bob Boardman's death was an unnecessary sacrifice & there is no need to repeat it. Thank you.

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**Correspondence ID:** 86      **Project:** 49246      **Document:** 58823

**Received:** [REDACTED]  
Aug,13,2014 00:00:00

**Correspondence Type:** Park Form

**Correspondence:** I would be in favor of a combination of alternative concepts, including removing of mountain goats.

My biggest concern is for public safety. I have watched park visitors read posted goat warnings and laugh as if the whole issue is just a joke. And I have heard others tell stories of getting very close to goats - intentionally. I have talked to parents of children who were so terrified they hid behind trees to get away from a goat.

I would be helpful to have staff dedicated to nuisance control and public education. As it stands, when a group of 12 goats shows up at Hurricane Hill, it may take hours for a patrol ranger to show up, if they are even available. By then, hundreds of visitors might have interacted with the goats, and the goats will move off without any aversive conditioning.

The no action alternative is the least realistic solution - the park does not have sufficient staffing to do aversive conditioning on a consistent and effective level.

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**Correspondence ID:** 87      **Project:** 49246      **Document:** 58823

**Received:** [REDACTED]  
Aug,13,2014 00:00:00

**Correspondence Type:** Park Form

**Correspondence:** Relocating would seem to be the best alternative. "Do nothing" has been proven wrong. Throwing rocks is not an acceptable method of goat control! I do not want to come down a trail after the three previous encounters with humans have involved rock throwing!

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**Correspondence ID:** 88      **Project:** 49246      **Document:** 58823

**Received:** [REDACTED]  
Aug,13,2014 00:00:00

**Correspondence Type:** Park Form

**Correspondence:** I feel the translocation option is the best choice. However, I wonder how the goats will deal with that situation - will they fight the strangers or socialize. If not translocation, I prefer they be killed.

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**Correspondence ID:** 89      **Project:** 49246      **Document:** 58823

**Received:** [REDACTED]  
Aug,13,2014 00:00:00

**Correspondence Type:** Park Form

**Correspondence:** I think it is important to protect our native plants and animals. Although these are beautiful animals, they are not native to the Olympic National Park.

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**Correspondence ID:** 90      **Project:** 49246      **Document:** 58823

**Received:** [REDACTED]  
Aug,13,2014 00:00:00

**Correspondence Type:** Park Form

**Correspondence:** I believe I understand the issue, the concerns, and the need for management. From my understanding - I believe removal is the best alternative. Clearly relocation is a kinder solution but I'm concerned with the dangers for humans involved. I like the proposed combination of moving a substantial number to Cascades & eliminating the remaining if not all can be removed. I am concerned that the National Forest be considered in the plan - makes no sense not to account for all goats.

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**Correspondence ID:** 91      **Project:** 49246      **Document:** 58823

**Received:** [REDACTED]  
Aug,13,2014 00:00:00

**Correspondence Type:** Park Form

**Correspondence:** I would support increased nuisance control option. Also removal. Why? Not native. Impacts on park environment, risk to rare species, et. I realize this will create flack for the parks. However, this is a problem that is not going to go away & should be solved in the most cost effective way.

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**Correspondence ID:** 92      **Project:** 49246      **Document:** 58823

**Received:** [REDACTED]  
Aug,13,2014 00:00:00

**Correspondence Type:** Park Form

**Correspondence:** 1. It must be difficult for most people to throw rocks at a big goat for what seems like no reason. Look how hard it is to get people to secure their food. That is, why ask for trouble, provoke the animal, if you don't have to.

2. A backcountry ranger told us to pee away from the campsite and off the trail. That would be hard on the meadow plants around the alpine campsite.

3. When is the irony of the "non-native" "invasive" species doctrine going to register? Middle-class white people must be immune to irony. Not that I don't love alpine plants, that's why we go up there.

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## **APPENDIX B: PUBLIC SCOPING HANDOUT**

[Appendix included in PDF version.]

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# Olympic National Park Mountain Goat Management Plan and EIS



## You're Invited!

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The National Park Service (NPS) is requesting your input in developing a Mountain Goat Management Plan and Environmental Impact Statement (plan/EIS) for Olympic National Park (the park). Your participation is vital to our planning process. There are many ways to be involved, including attending one of the in-person public scoping meetings and submitting electronic or written comments.

## Public Scoping Open House Schedule

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### **Monday, August 11:**

Seattle Open House, 5-7 pm,  
Seattle Public Library,  
Wright/Ketcham Room, Level 4, Room 2,  
1000 4th Avenue, Seattle, WA 98104;  
206-386-4636

### **Tuesday, August 12:**

Olympia Open House, 5-7 pm,  
Olympic National Forest Headquarters,  
Willaby-Klahowya-Coho Rooms,  
1835 Black Lake Blvd Southwest,  
Olympia, WA 98512; 360-956-2303

### **Wednesday, August 13:**

Port Angeles Open House, 5-7 pm,  
Port Angeles Public Library  
("North Olympic Library System (NOLS)"),  
2210 S. Peabody Street,  
Port Angeles, WA 98362;  
360-417-8500

## Background

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The mountain goat is not native to the Olympic Peninsula, having been introduced in the 1920s. By the early 1980s, the goat population in the park grew to over 1,000 individuals. Several hundred goats were removed during the 1980s, reducing the population to less than 400 by 1990. The population was stable at approximately 300 goats from 1994-2004, however it was observed to be increasing at a 5% annual rate in 2011.

The original need to manage the goat population was driven by ecological concerns related to the impact of goats on the park's natural resources, particularly sensitive vegetation communities. New concerns were raised in 2010 when a visitor was fatally gored by a mountain goat while hiking on a park trail.

The park updated its Mountain Goat Action Plan (part of the Olympic National Park Nuisance and Hazardous Animal Management Plan) in 2011. This plan addresses mountain goat behavior and seeks to minimize the potential for hazardous goat-human encounters. Planning and compliance is needed to address overall management of the mountain goat population within the park.

This effort will result in a plan that provides for overall management of mountain goats and considers the non-native goats' effects on natural processes and habitats, as well as visitor safety.

As part of the National Environmental Policy Act (NEPA) EIS process, the NPS will evaluate different approaches for managing mountain goats in Olympic National Park.





## Purpose of and Need for Taking Action

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The park's purpose in taking action is to develop a plan for managing the population of exotic mountain goats in Olympic National Park.

### Need for Action

Mountain goats were introduced to the Olympic Mountains prior to the formation of the park, and have since colonized the entire range with the majority of the population residing within the park.

Mountain goats have a high affinity for salts and natural salt licks within their native range. There are no natural salt licks in the Olympic Mountains and mountain goats have learned to seek salts from humans. In high use areas within the park, mountain goats have become habituated to the point that they are a nuisance and may be hazardous to park visitors.

Based on NPS policy, the park needs to manage exotic mountain goats to 1) reduce their interference with natural processes, native species and natural habitats and 2) reduce the potential hazards mountain goats pose to public safety.

## Plan Objectives

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- Develop a scientifically based method for the management of exotic mountain goat populations in an extensive alpine wilderness area.
- Protect the natural resources and environments that are unique to the park.
- Reduce the potential for visitor safety issues associated with mountain goats in the park.
- Further public understanding of Olympic's alpine ecosystems and native species and the ecology and conservation of mountain goats in their native range.
- Protect the biosphere reserve and natural heritage designations of Olympic National Park.
- Protect Olympic National Park's wilderness character.
- Work cooperatively with co-managers of mountain goats in Washington State (USFS, WDFW, and tribes).

## Preliminary Alternative Concepts

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NEPA requires federal agencies to:

- consider a range of alternatives and;
- fully evaluate all reasonable alternatives that address the purpose of and need for the action, including a No Action alternative.

The following is a list of preliminary concepts that have been developed so far by NPS staff. Please provide us with your thoughts about this initial list, and offer any ideas you might have for additional alternative concepts.

**No Action Alternative** – The continuation of current management consisting primarily of monitoring, control and aversive conditioning of nuisance animals as staffing and resources allow.

**Combination of Alternative Concepts** – Develop a hybrid alternative combining elements from two or more alternative concepts.

**Increased Nuisance Control** – Provide increased management/nuisance control (aversive conditioning or lethal removal) of habituated mountain goats and habituated bands of mountain goats in high visitor conflict areas.

**Capture and Translocation** – Capture and translocate mountain goats to the Washington Cascades and potentially to other appropriate receiving locations.

**Removal** – Remove all mountain goats through lethal means.



## NEPA and Where We Are in the Process

Summer 2014	Public Scoping	WE ARE HERE
Summer 2015	Draft Plan/EIS Release and Public Comment	
Winter 2015-2016	Final Plan/EIS Release	
Spring 2016	NPS Record of Decision	

## How to Comment

1. Submit comments electronically at:  
<http://parkplanning.nps.gov/olyngoat> (preferred method).
2. Submit comments at an in-person public meeting.
3. Submit written comments at the park’s offices in Port Angeles or by mail to:

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

All written comments must be postmarked and all electronic comments must be submitted no later than 60 days from the date the Notice of Intent is published in the Federal Register. The deadline for submitting comments will be posted on the project website.

*You should be aware that your entire comment—including personal identifying information such as your address, phone number, and e-mail address—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. Comments submitted by individuals or organizations on behalf of other individuals or organizations will not be accepted.*

## Mailing List

If you wish to receive future updates on this project, please send an email to [olym\\_goats@nps.gov](mailto:olym_goats@nps.gov) and include your email address. Public comments will not be accepted at this email address. The mailing list will be used solely to communicate information related to the park’s mountain goat planning effort. If you do not have an email address, please contact the park at (360) 565-3004 to have your name placed on the mailing list.

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