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OCT - 4 2006

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Baltimore, Maryland 21228

September 25, 2006

Olympic National Park GMP
NPS Denver Service Center
PO Box 25287
Denver CO 80225

Dear National Park Service:

Please consider this letter as our comment on the draft General Management Plan for Olympic National Park. We received the draft in CD form and reviewed it in light of our experience with the park. I (George) am a native of Washington state and visited the park many times before my career brought me to the east coast.

Olympic National Park is a precious remnant of the wild Olympic Peninsula that was intact as recently as 100 years ago. So much was lost before the park was established – and around it since then – it would be a grave mistake to let any of the park land be compromised. We find several elements of Alternative D to be commendable, but we are disappointed with the emphasis on new developments and a failure to take more aggressive steps in the restoration of wilderness and wildlife values in the park. In particular we believe the draft violates the management mandates of the Wilderness Act by allowing too many buildings in the wilderness area – far beyond the “minimum necessary” standard.

Boundary Changes: We commend NPS for the proposals in Alternative B for additions to the park amounting to 87,000 acres. The tiny additions in the Alternative D are far from enough to achieve the objectives of the park. Our specific comments are:

- **Ozette Lake.** I have hiked in this area, from Ozette Lake to Cape Alava. It is wise to expand the park to include the whole of the Ozette Lake watershed, both to protect and restore the salmon population and to provide a complete wildland experience for visitors in this area – those hiking in to the wild beach and those visiting by nonmotorized boats on Ozette Lake. At present the lands bordering the lake are unprotected except on the west bank. Also, so much of the ONP ocean strip is a narrow band paralleling the shoreline, this wider section is of great value for visitors and for ecological values. The addition in Alternative B should be adopted.
- **Lake Crescent.** I have visited this area several times. The edge of the park on the north side of Lake Crescent is too close to the lake to provide an adequate protective buffer. The addition in Alternative B would protect the spawning streams for the *beardslee* and *crescenti* trout, and give better protection to the visitor-use values of Lake Crescent.

Frontcountry Development: There is a serious fallacy in Alternative D in the expansion of “development zones.” Apparently the idea is that construction of more campgrounds and concession buildings will be needed to provide for growing numbers of

visitors. That approach will lead you into an unending “arms race,” in which every increase in visitors must be met by an increase in developments. The essential resources of the park will suffer, and future visitors will be the victims because the park will lose its wild character, step by step.

There is an alternative that has been working at Olympic and has also been proven in many other parks – namely to rely on private enterprise and state and county parks to provide lodgings, campgrounds, and tourist services outside park boundaries. This approach has built lively “gateway communities” around many parks, such as Zion, Bryce, Canyonlands, Arches, Capitol Reef and Shenandoah. Hundreds of private campgrounds are now franchised by national corporations such as KOA. We have seen similar private campgrounds in Europe, where they are tastefully landscaped to accommodate families both with tents and RVs. In France many municipalities operate handsome campgrounds, with a view to attracting visitors to stay and patronize local businesses.

There has been outstanding growth in tourist services in the Olympic gateway communities over the past 50 years. Let’s continue this progress, so visitors’ needs can be met without any loss in the values of the park. Our specific comments are:

- Elwha Valley. I have visited this area many times. It is incongruously wrong to enlarge the development zone for 2 miles along the Elwha road from the park boundary to Altair campground and another zone on Lake Mills. We believe visitors are entitled to enter the park and immediately find a wild, unspoiled landscape beside the road – not a complex of campgrounds and concessions. This is an important day-use area, and its value as such should be protected. When the dam is removed and fish runs restored, the Elwha Valley will become even more important for day visitors. Alternative A should be adopted, retaining the present developed sites.
- Sol Duc Hot Springs. I visited this area when I hiked up the Sol Duc trail to High Divide on an overnight trip. Again, it is a mistake to expand developed areas when this area should be valued more for day use and as a gateway to the backcountry. Alternative A should be adopted.
- Hurricane Ridge. I visited this area many times. NPS has wisely held the line for many years against additional developments here. For visitors who never leave the roads, this is the greatest scenic point of the entire Olympic National Park, with its dramatic panorama of mountains and deep valleys. It is incredibly unwise to contemplate any more structures here, because they would clutter what is a magnificent wilderness vista. Neither skiing facilities nor summer facilities should be allowed to encroach on the wild landscape of Hurricane Ridge.

Public Transportation: We commend NPS for proposing the study and implementation of optional public transportation at Hurricane Ridge, Sol Duc, and Hoh River. The studies should include a summer shuttle to Obstruction Point, to enhance visitors’ opportunities on Hurricane Ridge – comparable to shuttle buses we have used in the French Alps that convey people to trailheads from parking areas located at tourist towns.

We have used the excellent shuttle buses at Zion and Harpers Ferry. At Zion two routes are used – one to bring visitors to the park entrance from the business district of Springdale, the other to take visitors into Zion Canyon. The shuttles have several advantages:

- Fewer visitors' cars arrive at the scenic high points of the park, meaning fewer traffic jams and less need for parking areas.
- Visitors arrive in a better mood because they have avoided the hassle of driving in a traffic jam and looking for scarce parking spaces.
- Parking for visitors' cars can be developed outside the park, where more suitable topography exists and where information and restroom facilities can be erected without impacts on the park.
- Interpretive messages can be provided by bus drivers, with scripts and training provided by NPS park naturalists.
- Shuttle vehicles can use the least-polluting technologies available, such as natural gas, meaning cleaner air in the park.
- Parking often can be at a gateway community, thus placing visitors near private enterprises that want to serve them with food, lodgings, and gas.

Wilderness Management: In 1988 Congress wisely designated 95 percent of Olympic NP as wilderness. NPS has the job of managing the wilderness areas under the mandates of the Wilderness Act. We would like to see a wilderness management (or "stewardship") plan developed, so the decisions can be made systematically, in compliance with the requirements of the Wilderness Act.

We deplore the notion in Alternative D that between 29 and 50 buildings in the backcountry must be treated as "historic" structures and repaired or rehabilitated to keep them in service. I (George) am familiar with wilderness areas in many areas of the West and East. I have personally seen the remnants of many old cabins, shelters, and fences in wilderness areas that have been allowed to merge back into the natural landscape. Before blanketing those buildings in as permanent structures in the GMP, you need to make a determination whether each qualifies as the "minimum necessary" under the terms of the Wilderness Act and NPS Management Policies. That should be approached through the Wilderness Management planning process, with public participation. If you believe that historic preservation laws present a conflict with the Wilderness Act mandate, that issue should be addressed and resolved in that planning process.

The three zones proposed – Primeval, Primitive, and Trail – seem to indicate that less protection will be given to the Primitive and Trail zones. That is not consistent with the Wilderness Act, in which one management mandate applies to the entire wilderness area.

Olympic Coast: We also favor the Intertidal Reserves proposed in Alternative D. They would complete the protection of the Olympic coast as advocated by Justice William O. Douglas and his companions in their historic hikes in 1958 and 1964. We also favor the relocation of the lodge, facilities, and highway at Kalaloch as proposed.

River Management: We urge you to adopt the "river protection" provisions described in Alternative B. Under Alternative D it appears that NPS intends to manipulate rivers to protect existing roads. That is unwise. Armoring and channelizing parts of these wild rivers would impair one of the great natural features of the park, namely the 13 rivers functioning in a natural ecosystem with all the aquatic and terrestrial organisms that are part of that ecosystem. We urge you to re-think the park road system and identify places where the roads are so close to the river that meandering and flooding will cause major damage to the road. Those sections should be considered for re-routing outside the river meander zone, so you will be able to leave the river alone.

We also ask NPS to resume the studies of all 13 rivers under terms of the Wild and Scenic Rivers Act, and bring forward recommendations on their suitability for designation as wild rivers. The Elwha is not the only river that is likely to qualify. We would like to see all the Olympic rivers receive this consideration and the added layer of protection that can result.

Thank you for considering our comments. We trust the final plan will give Olympic National Park the strong protection it deserves.

Sincerely,

