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September 27, 2006

Carla McConnell  
Olympic National Park GMP  
NPS Denver Service Center – Planning  
P. O. Box 25287  
Denver, CO 80225

Dear Ms. McConnell:

As long time supporters of Olympic National Park [ONP] and its Wilderness of both the park's interior and its coastal area, we submit a few comments on the Draft General Management Plan for Olympic National Park's future over the 15 to 20 years ahead.

A general comment: It is of utmost importance that these wild, untrammled, as well as some trammled areas of ONP receive top priority to continue their naturally ecological evolution.

We thoroughly endorse the designation of **Intertidal Reserve Zones**, and discontinuing permission for visitors to remove live organisms. This "no take" provision needs to extend throughout the entire Coastal Area within ONP. This is especially important in view of its increasing popularity for visiting and hiking. The entire intertidal area within the exterior boundaries of ONP should have a formal Wilderness designation.

Concurrent with increased protection for the intertidal areas of ONP, we are delighted with the proposal to secure designated **Wilderness for Lake Ozette**. When the lake was included in ONP in 1986, it was the hope and aim that it be a Congressionally-designated Wilderness, elevating it from its status as a de facto wilderness – especially after the lake's small islands were also acquired.

We are also pleased to see the proposal to **add to ONP Lake Ozette's watershed** for its protection from contaminating run-offs. We advise, though, that the area be enlarged to encompass the entire watershed. One disturbing proposal is any provision wherein the Washington State Department of Natural Resources would continue timber operations in this watershed. From years of experience with the DNR's procedures, its activities in the watershed can be – no doubt, will be – detrimental to the quality of the shorelines and waters of Ozette Lake.

We are surprised the ONP GMA apparently decided **River Zones** weren't needed after all in ONP's Preferred Alternative. It is inconceivable to us that the NPS would exclude from protection the "riparian and aquatic communities, indicator species, and water quality, and visible impacts such as the presence of trash and invasive plants." ONP would better fulfill its purpose for being established by providing for "self-sustaining natural riverine systems...largely untouched by humans, or where restoration is feasible." By not providing for River Zones, as outlined in your rejected

Alternative B, the stage is being set for more human impacts and degradation during the next 15 to 20 years the new GMA is in place, as well as further impacts on salmon migrations. It is essential, also, to designate a number of rivers as Wild and Scenic. By all means – **River Zones and Wild & Scenic Rivers need to be established in ONP.**

**A major concern:** In essence, this ONP GMA is – definitely appears to be – writing the Wilderness Management Plan that ONP has been “putting aside” ever since the designation of ONP Wilderness in 1984. And – it is doing so **WITHOUT** specific public participation. *This GMA is not the proper vehicle for the Wilderness Plan ONP was, mandated to prepare 20 years ago upon passage of the Washington National Park Wilderness Act.*

Nevertheless, with this in mind, we will comment on some of the issues relating to the Wilderness within Olympic National Park

When Olympic National Park was established in 1938, its de facto wilderness was a major incentive for protecting this extremely important area of the United States. **It continues to be of the utmost importance for the wild, untrammeled areas of Olympic National Park to receive top priority to continue their natural ecological evolution.** This is true for **both designated Wilderness and for those areas not so designated but still retaining a natural or semi-natural condition.**

*A review of The Wilderness Act:* **“A wilderness, in contrast with those areas where man and his works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain....”** This prompted a review of the words, “where man and his works dominate the landscape”.

**Within Olympic National Park and within its designated Wilderness are a multitude of man-made structures** and other evidences left over from the earlier Olympic National Monument administration by the U. S. Forest Service, plus buildings allowed to be erected during the early period of National Park Administration of Olympic National Park. These are itemized in the ONP Draft GMA, and they are mis-labeled as “historic”.

Considering these to be “historic” is an anomaly. These works of man continue to “dominate the landscape”. The “historic” appellation belongs to the natural areas on which these man-made “works” were superimposed. ***The presence and retention of these structures are contrary to the intent of The Wilderness Act and in violation of the requirement that these areas of ONP be returned to being what they first were.*** – **“A wilderness, in contrast with those areas where man and his works dominate the landscape, ..... an area where the earth and its community of life are untrammeled by man...”**

**These structures within ONP’s Wilderness are in violation of The Wilderness Act’s provision cited above.**

We disagree and disapprove of ONP’s and NPS’s attempt to re-write The Wilderness Act through **categorizing** so-called “ZONES” within designated Wilderness. *This idea needs to be completely removed from any consideration in the ONP GMA.*

**To reiterate: Any Wilderness Management proposals that make it into the forthcoming Olympic National Park's new General Management Plan, need to be, and shall be, superseded by an official Wilderness Management Plan -- A proposed Wilderness Management Plan that will not be adopted until after it has had full public participation in advance.**

We have been familiar for many years about some of the events taken to protect this area on the Olympic Peninsula. It is a background we have a feeling that many in the National Park Service may not have a familiarity with. We are sure, in general, you are dedicated to the long range protection of the naturally wild forests, meadows, lakes, and streams, rock and ice, wild fish and wild mammals indigenous in Olympic National Park. However, it would seem from the ONP GMA's Preferred Alternative, as planners you may not be cognizant of, overlooked, or, possibly ignored the many efforts and steps taken, and achieved, to preserve ONP's wilderness attributes.

The early 1900 Executive Order by President Theodore Roosevelt responded to concerns about over-hunting of the Olympic Peninsula's indigenous elk, threatening survival of the population -- resulting in the Olympic National Monument. However, being under the jurisdiction of the U. S. Forest Service, it became apparent to a number of citizens that this agency was more interested in the commercial development of the area's virgin, primeval forests. Even as late as the mid 1920's this agency apparently did not recognize, or understand, or have an interest in keeping the area natural.

Thus, it did not prevent **the introduction of non-native mountain goats brought in from South Central Alaska and British Columbia.** Those attractive, but never previously inhabitants on the Olympic Peninsulas, create ecological damage to this day. Even though some efforts were made within the last fifteen or so years to remove the non-native mountain goats, a population does remain and continues to damage indigenous plant life -- as well as damage to meadows from their wallowing. **The ONP GMA needs to put forth a positive plan to ultimately eliminate the non-native mountain goats.**

**We are pleased** to learn that ONP and the Washington State Department of Fish and Wildlife are jointly taking **steps to return the extirpated Fisher** to the Olympic Peninsula ecosystem.

However, we are disappointed that ONP is ignoring previous studies showing its overall ecological system would provide satisfactory habitat for **reintroduction of wolves.** This option should not be kept out of this General Management Plan for Olympic National Park. **In the long range restoration for a naturally evolving ecosystem, wolves are essential for being returned to ONP.**

We concur with recommendations for **additions to ONP** in the vicinity of Lake Crescent, the Quinault area, and the Queets and Hoh River drainages. These all need to be in ONP's Preferred Alternative.

We do have some concerns about what are categorized as **Development Zones.** It is really "going overboard" to spread out massive campsites!! The traditional small group or small family campsites are far more attractive and appropriate to ONP. Those "big houses (RVs) on wheels" are best accommodated in areas on private or other public lands outside the boundaries of ONP.


We are dismayed to hear the ecosystem surrounding the **Elwha River** may not be fully protected. Once the area around Lake Mills is restored following removal of the Glines Canyon and Lower Elwha dams, **no remnant of the Glines Canyon dam should be retained.** Any historic reference to it should be developed at the Visitor Center in Port Angeles. A replica there of the original installations would be most appropriate.

Among other areas we could comment on is the proposal to relocate the Kalaloch facilities and highway in the vicinity. We would like to see ONP show increased concerns for protection of all varieties of wildlife and fish habitats.

And, again, – **Wilderness** should be, to ONP and NPS personnel – the top priority for long range protection and natural evolution within ONP's ecosystem. Actually, this needs to be achieved **before** a General Management Plan is implemented for Olympic National Park. It is essential – should be mandatory – for ONP to, first, complete its long overdue Wilderness Management Plan – --- with public input in advance.

Thank you for the opportunity to submit these comments.

Sincerely,

  
Seattle, Washington 98125-4617

cc: Jon Jarvis, Pacific Region, NPS  
U.S. Senator Patty Murray  
U.S. Senator Maria Cantwell  
U.S. Representative Norm Dicks  
U.S. Representative Jim McDermott