PORT
OF PORT ANGELES
WASHINGTON

September 21, 2006

Mr. Bill Laitner, Superintendent
Olympic National Park
NPS Denver Service Center – Planning
P.O. Box 25287
Denver, CO   80225

Re: Olympic National Park
        Draft General Management Plan
        Environmental Impact Statement

Dear Mr. Laitner:

The purpose of this letter is to place on the record the comments of the Port of Port Angeles POPA) regarding subject Draft General Management Plan for the Olympic National Park (ONP). As background, POPA was established in 1923 to provide marine terminal facilities to support economic development on the North Olympic Peninsula. The Port has become the leading economic development agency in Clallam County.

POPA certainly comprehends the importance of resource protection for ONP, and many aspects of the Plan are visionary and commendable. However, the Port has a legislated mandate to promote economic development. In the case of our community, economic development is primarily reflected in protecting and expanding the increasingly challenged employment base in Clallam County; i.e., sustainable family wage jobs. Therein lies the conflict. The Port has serious concerns that the draft plan fails to adequately take into account the true long term direct negative impacts of changing ONP boundaries while failing to make the case that significant improvement in ecological protection will be achieved. For example, on page 372, the Draft Plan reads in part as follows:

> **Proposed Additions to the Park Boundaries and Other Adjustments.**
>
> **Under Alternative – D (Preferred Alternative) three areas totaling approximately 16,000 acres, would be added to the boundary of the Park:**
> - **Queets – 2,300 acres**
> - **Lake Crescent – 1,640 acres**
> - **Ozette – 12,000 acres**

In addition, approximately 44,000 acres of land in the Lake Ozette watershed would be acquired outside the boundaries of ONP and exchanged with the State of Washington Department of Natural Resources to be managed under the "Legacy Forest" concept.

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EXECUTIVE DIRECTOR
Robert E. McChesney

These proposed modifications to ONP boundaries would have the effect of removing valuable timber acreage from commercial harvest. This would have a devastating long term impact on the local timber industry and would permanently eliminate many job opportunities. Our North Olympic Peninsula Community simply cannot absorb these losses and the Port strongly opposes the suggestion.
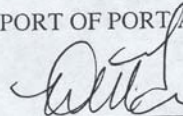
Further, the economic impact analysis that would support many of the proposed changes appears to be insufficient. Expanding Park boundaries will be detrimental to the commercial timber industry. For example, the jobs categories illustrated in Tables – 17 and 18 (pgs. 168-169) grossly understates the true jobs impacts in both raw numbers of jobs as well as their annual earnings. We know from our own payroll sheets that many workers participating in the timber supply and logistics chain make annual salaries far in excess of the $18,636/year shown in Table-17. Consequently, we dispute their validity.

Significant gains in ecological protection through expanding Park boundaries into commercial timber lands are questionable and speculative compared to the measurable reductions in economic activity that will occur. Washington State recently adopted Forest Practice Rules which the federal agencies recognized as providing long term protection to aquatic species. The acceptance of the State programmatic Habitat Conservation Plan under the Federal Endangered Species Act should reassure the Park that Park resources will be protected from neighboring commercial forest activities. Clearly, expanding Park boundaries are not necessary to protect sensitive resources.
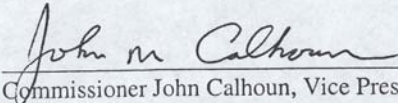
POPA appreciates the opportunity to comment on the proposed Draft General Management Plan for ONP. The Park is an important public asset. We should find ways to make it better but without putting other hard working families in worse circumstances because of it.
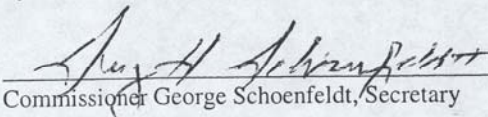
Sincerely,

PORT OF PORT ANGELES

Commissioner Bill Hannan, President

Commissioner John Calhoun, Vice President

Commissioner George Schoenfeldt, Secretary