

PEPC 191179

## GREEN CROW

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Re: Comments on the Olympic National Park Proposed General Management Plan

The following comments are being submitted on behalf of Green Crow, a Port Angeles based family owned company that has been in the timber business for many years.

As background, we as a company sincerely care about our community and believe that we should give back to those that have helped make us successful. This includes the 140 employees directly employed by Green Crow through its various companies or partnerships, and the other approximate 300 additional truck-drivers, mill-workers, foresters, road builders, etc. that are employed with family wage jobs that provide essential services so that we may operate. Most of these employees reside on the Olympic Peninsula.

We also appreciate the fact that we have the Olympic National Park in our backyard.

The comments in this letter are more general in nature since comments already submitted by our research biologist, chief forester, and WFPA are very focused and specific.

---First, our company was and is upset by the method the ONP used to convey their thoughts regarding proposed changes with their neighbors. The first time we saw anything about this current recommended proposal was a headline in the local paper. This is a great way to treat your neighbors!

---Second, there are numerous conclusions throughout the document that have little or no factual or scientific basis. The ONP does not seem to have to abide by the rules requiring economic or scientific peer review when promulgating a position and the authors of the document should state these items as opinions and not facts if in fact there is little statistical validity. Others have highlighted many of these inaccuracies, but just a few egregious examples include the following:

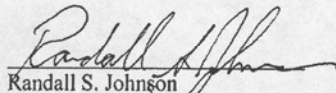
- 1) Summary of comparative costs (page 64) gives a range of estimates for the addition property to expand the ONP boundary and add the acquisition of additional property and for the exchange of mineral rights. Since our company has evaluated and been involved in almost all major timberland acquisitions in the States of California, Oregon and Washington for the past ten years, these numbers do not even begin to reflect reality. Our best estimate of cost would be \$150 to \$200 million for the acquisition of the property outlined in this document. What kind of cost benefit would result from this acquisition? Since there is a large backlog of other unfounded projects, is this the best use of the limited financial resources of the ONP?
- 2) A large component of the economic benefit from Alternative C and D in the ONP planning document is the increased recreation visits to the Park. Based on the ONP projection (page 173), there is an upward trend in visitation with a very low correlation coefficient and therefore little statistical accuracy. However, if one used the data beginning in 1995 through the current year, there would instead be a negative trend line showing even fewer ONP visitors. This negative trend line would be more appropriate given the data for the other U.S. National Parks where there has been a drop in visitation by 25% over the past sixteen years. (You should read the article in the Washington Post on July 5<sup>th</sup>, 2006 regarding "Videophilia Keeps Americans Indoors"). If one instead believes the resulting negative trend line beginning in 1996, there would be little or no

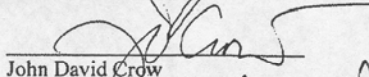
economic benefit to the Park proposed expansions under any alternative. Except at ONP's hypothetical macro-economic level, there is little reason to believe that any of there proposed expansion plans would result in any additional economic benefit. If examined on a specific project basis, we do not believe that there would be any economic benefits to any expansion. In fact, the resulting loss in family jobs based on less timber harvest would result based on our projections in 600 to 900 fewer family wage jobs.

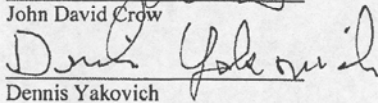
- 3) The Analysis of Boundary Adjustment and Land Protection Criteria (pages 369 to 372) is particularly flawed. As has been addressed by our biologist and chief forester, this and many, (many, many) other parts of this plan fail to recognize the benefits of private forestland being managed under the State of Washington's Habitat Conservation Plan and the Washington Forest Practices Laws. We as a company believe that the protection of critical wildlife habitat and the protection of traditional land uses are not mutually exclusive concepts. In fact, private forestland will provide a much greater benefit to elk; deer, bear and many small animals then will be found in the ONP on their unmanaged regime. In addition, we as a company have set aside approximately 20% of our land for protection of riparian dependent species at a considerable financial cost. Finally, we are on a program to finish our "Road Maintenance and Abandonment Plan" for the benefit of fish and other riparian species within the next nine years. As an example, our company is spending approximately \$1.0 million dollars this year on culverts, bridges and roads strictly to improve fish habitat. The ONP cannot currently fund programs needing maintenance within their current Park boundary, and why would anyone believe that they would improve in the future with additional capital requirements.

Therefore after much soul searching and because we all care about the economic health of this area, we find ourselves unable to recommend any alternative but A.

Thank you for accepting our comments.

  
Randall S. Johnson

  
John David Crow

  
Dennis Yakovich