

CITY OF



PORT ANGELES

WASHINGTON, U. S. A.

City Manager's Office

September 29, 2006

Olympic National Park General Management Plan
U.S. National Park Service
Denver Service Center
P.O. Box 25287
Denver, Colorado 80225

(Also sent via fax 303-969-2736)

RE: OLYMPIC NATIONAL PARK DRAFT GENERAL MANAGEMENT PLAN

Port Angeles serves as the primary gateway community for access to the Olympic National Park. On behalf of the City of Port Angeles, the following comments are submitted with regard to the Olympic National Park's draft Draft General Management Plan/Environmental Impact Statement. Day to day management of the ONP generally has minor direct impacts on the City of Port Angeles. However, there are indirect impacts that are significant and should be kept in mind. The adoption of a general management plan (GMP) by the National Park Service (NPS) for the Olympic National Park (ONP) will have implications for the City of Port Angeles, its citizens and visitors, as well as the greater Olympic Peninsula region for decades.

GENERAL COMMENTS

As an agency within the US Department of Interior, the National Park Service manages the resources of the Olympic National Park (ONP) under a responsibility "to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."¹ Balancing wise stewardship of resources with recreational and research use of, and access to, those resources can be challenging. Recognizing this challenge, we respectfully submit the following comments on the Park Service's draft GMP for Olympic National Park. Specifically, we believe the NPS will better achieve its difficult mission if the final GMP emphasizes among other things, the development of appropriate visitor facilities, expanded interpretive programs, appropriate boundary adjustments and stronger cooperative relationships between ONP management and staff personnel and local government agencies and NGO groups.

Visitors to ONP come expecting to find appropriate and safe facilities capable of adequately serving their needs. Some park facilities are indeed well maintained. However, many of ONP's current facilities are in need of considerable renovation, expansion or improved accessibility. We are in order for ONP to remain a relevant and vibrant jewel upon the peninsula a major focus of the general management plan should be on the improvement of visitor access and park visitor experiences. This can be accomplished by augmenting

¹ National Park Service Organic Act

existing infrastructure, where practical, with facilities such as additional bike paths, new trails, expansion of the lodging seasons, the development of new campground sites, developing and improving access for seniors and others people with physical limitation. Furthermore many facilities are showing significant evidence of deferred maintenance.

The City of Port Angeles therefore encourages the Improvement of visitor facilities and access in the front country, especially for individuals with limited abilities to enjoy the less accessible portions of the park. The city would also support a shift in NPS policy and ONP management interpretation and implementation of such policies that Park concessions be operated more by local vendors rather than out-of-area franchise vendors. Furthermore we would like to see policies that encourage concessionaires to make more locally made products available in the concessions rather than trinkets produced off-shore.

The draft GMP outlines several proposed property acquisitions. We understand that future park boundary adjustment and land acquisition may be in keeping with sound stewardship practices. However, these adjustments and acquisitions should not come at the expense of the livelihood of community members and the existing economic foundations of the region. The NPS cannot be allowed to undertake a proposal to expand the boundaries of ONP areas when such a proposal would add additional regulatory burdens to private land owners. Emphasis on land acquisition should be placed on those landowners who approach the NPS willing to sell their property. Furthermore those acquisitions must be the result of fair and honest negotiations that do not arise from undue pressure or influence by NPS staff. Finally, boundary adjustments should not come at the expense of maintaining existing infrastructure and visitor access, or at the expense of modernizing and improving outdated and/or undersized existing visitor related facilities.

The City of Port Angeles is interested in the health of local fisheries and has witnessed a decline in both the commercial fishing industry and the sport fishing industry. In that regard, the city has worked closely with local tribes, the county and cities making up the North Olympic Lead Entity Group for salmon recovery as part of the State's Salmon Recovery Initiative. It is in the City's best interest to maintain a healthy fishery on the north Olympic Peninsula. These fish species are the Lake Ozette sockeye salmon and the Beardslee and Crescent trout found in the area of Lake Crescent.

However, the NPS data, and analysis of proposed acquisitions, associated with the economic benefit of boundary expansions does not appear to comply with the Information Quality Act and the guidance associated with said Act as provided by the Office of Management and Budget. The economic analysis appears to lack significant quality in the information provided and relied upon. In addition, the analysis appears to lack objectivity with regard to the total economic impact of specific proposed boundary expansions at Lake Ozette and in the vicinity of Crescent Lake. The City would specifically request correction of the presentation and substance of the economic analysis of both the Lake Crescent and Lake Ozette area boundary expansions. This request is based upon the a belief that the proposed expansion will create additional regulatory burdens upon private and state timber lands owners/managers resulting in additional costs associated with timber management.

Very specifically, in relation to the proposed acquisitions in the area of Lake Crescent would bring private commercially productive timber lands under the control and management of the NPS for the intended purpose of protecting riparian habitat for the Beardslee and Crescent Trout populations of Lake Crescent. However, critical area regulations for timberland

management practices provide the necessary and sufficient protections for such habitat and wildlife protection.

Much of the acreage is owned by private timber interests and removal of the large amount of area from timber production, especially as proposed in Alternative B, could have widespread economic impacts on the local timber industry. These impacts could affect the operation of existing mills, the prospects for creation of new mills, and the employment level of individuals in the forest industry generally.

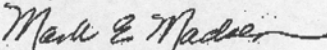
We encourage NPS must to strengthen its working relationships with surrounding communities. It is appropriate that the NPS in this draft GMP has specifically noting that the Olympic park staff must be actively engaged in the communities in and around park borders. We encourage the Park Service to implement this engagement as soon as possible and focus on increasing the communities' understanding of ONP and marketing the region to the visiting public. We also believe that the ONP staff must be actively engaged in various state-directed local planning initiatives associated with Watershed Resource Inventory Planning and salmon recovery efforts. In these particular forums, the ONP has been absent even though it is one of the largest land owners with specific federal obligations associated with salmon recovery.

We believe the implementation of these simple suggestions are in the best interests of the park, its stakeholders, gateway communities, resources and wildlife.

We recognize that the GMP is based on NPS Park management policies and principles, and is not based on financial considerations, even though it does carry financial implications. The GMP clearly stated that any alternative is contingent upon money being available and allocated through traditional funding sources. The City remains concerns that the ONP has not received funding from Congress necessary to carry out its mission. Furthermore, we are concerned that continuation of this practice will not only limit implementation of a final GMP, but will further degrade the ONP through attrition of staff, discontinuance of services and programs, and neglect of facilities.

The City recognizes and appreciates the wide range of benefits that Olympic National Park brings to the city and region in the form of environmental health, resource protection, tourist trade, research dollars, and world wide publicity. We appreciate the effort that has gone into development of the draft GMP and the opportunity to comment on the Plan.

Respectfully submitted



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City Manager