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September 27, 2006

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

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

To Whom It May Concern:

We are writing on behalf of the 5,400 members of the Seattle Audubon Society to provide comments on the Olympic National Park Draft General Management Plan Environmental Impact Statement. Our organization has advocated for the protection of birds and wildlife throughout Washington State since our founding in 1916. In fact our members were deeply involved in establishing Olympic National Park several decades ago.

Due to the large wilderness area encompassed by Olympic National Park and its recognition as an internationally significant ecosystem, Seattle Audubon is extremely interested in making certain that this park retains the ability to provide adequate habitat for the numerous plant and animal species that exist there. The federally threatened northern spotted owl and marbled murrelet are species of special concern for not only our organization, but also the federal and state wildlife agencies.

Our volunteers have carefully reviewed the four alternatives proposed by the National Park Service. In order to manage the park to leave it "unimpaired for the enjoyment of future generations" as dictated by the NPS Organic Act (16 USC §1), alternative B is the only viable alternative. This alternative, which allows the park to be managed as an ecosystem preserve, will most effectively protect birds and the natural environment. Alternative B calls for a reduction of trails and related facilities, which will provide more opportunities for solitude in the wilderness and would provide a healthy environment in balance with nature, where people enjoy, respect, and care for the natural resources that sustain the community of life.

Alternative B is the only alternative that includes both a river zone and an intertidal reserve zone, as well as a larger primeval zone. These zones are important for the sustainability of birds and other wildlife. In addition, Seattle Audubon endorses the use of alternative transit systems in place of roads, which are becoming increasingly congested. This includes snowcoach use in providing winter access to Hurricane Ridge. We support the notion that current roads should be maintained to support current capacity or less, which may involve relocating or closing roads, either permanently or seasonally. Whatever decisions are made with regard to roads, we strongly believe that additional

roads and road-related facilities should not be added without first completely decommissioning current roads.

Seattle Audubon strongly supports the acquisition of boundary lands (as described in alternative B), including the Lyre River and Boundary Creek land near Lake Crescent, the Ozette Lake watershed, the Hoh floodplain, the Queets watershed, and area near the Quinault River. These lands, as was acknowledged in the Environmental Impact Statement, will protect important elk, trout and salmon habitat. Protection of these areas is especially important given the increase in development and timber harvest which would be detrimental for these and other species. The acquisition of boundary lands such as stream corridors will also provide a buffer to the older growth forests and streams within the Park.

Alternative D, which strives to protect resources and improve visitor experiences, does not place enough emphasis on habitat protection. It states that "natural processes will be promoted, and some previously disturbed areas would be restored..." but does not provide any further details. Moreover, this alternative "might adversely affect spotted owls and marbled murrelets" (see page 88). This is simply unacceptable, particularly given recent population declines of both species.

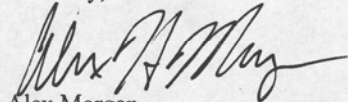
Alternative C places too much emphasis on accommodating visitors. While visitor access is important, this alternative calls for increased zoning for development to accommodate more visitors. While mass transit is being considered and most wilderness would be designated as primeval, increased development and tourism in the park could be detrimental to the habitat of numerous species; specifically, alternative C "might adversely affect spotted owls and marbled murrelets" (see page 88).

Alternative A is the no action plan, but this plan is not desirable because of the park service's concern that the park faces major user capacity issues (see page 74). The no action alternative does little to alleviate pressures on resources from increased visitor use of the park.

Therefore, we strongly urge you to implement alternative B, as it includes a larger primeval zone and is the only alternative to include a river zone. This alternative reduces the amount of visitor facilities and opportunities during peak use periods, but provides higher quality visitor experiences while also sustaining wildlife habitat.

Thank you for accepting our comments. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Alex Morgan", written over a horizontal line.

Alex Morgan
Conservation Director