



September 13, 2006

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

Re: Draft General Management Plan for the Olympic National Park – Wild and Scenic Rivers

Dear Superintendent Laitner:

On behalf of American Rivers and our 2,700 members in the Pacific Northwest, I am writing to express our deep concern regarding the National Park Service's stated intention in the Olympic National Park Draft General Management Plan (June 2006) to drop any further analysis or recommendation of rivers, other than the Elwha, for inclusion in the national Wild and Scenic Rivers system.

Under the Wild and Scenic Rivers Act, all federal land management agencies, including the National Park Service, are required in their planning processes to study rivers for eligibility in the national system. According to Section 5(d)(1), "In all planning for the use and development of water and related land resources, consideration shall be given by all Federal agencies involved to potential national wild, scenic and recreational river areas, and all river basin and project plan reports submitted to the Congress shall consider and discuss any such potentials. The Secretary of the Interior and the Secretary of Agriculture shall make specific studies and investigations to determine which additional wild, scenic and recreational river areas within the United States shall be evaluated in planning reports by all Federal agencies as potential alternative uses of the water and related land resources involved."

Pursuant to the Wild and Scenic Rivers Act, Section 5(d)(1), National Park Service's own management policies state that "Potential national wild and scenic rivers will be considered in planning for the use and development of water and related land resources. The Service will compile a complete listing of all rivers and river segments in the national park system that it considers eligible for the national wild and scenic rivers system." (Section 2.3.1.10)

Given that the National Park Service has not updated its management plan for the Park since 1976, and that the next management plan revision will most likely not occur for

another 20 years, we believe it is particularly important to study and recommend rivers for their eligibility in the national Wild and Scenic Rivers system in this general management plan process. Many of Olympic's rivers are clearly of Wild and Scenic caliber, and they contain some of the best remaining habitat for wild salmon. The Park Service, in a preliminary analysis, has already determined that 13 rivers are eligible for inclusion in the Wild and Scenic Rivers system. As noted in the draft plan, "Most of the eligible portions of these rivers are in designated wilderness, and wild and scenic river designation would compliment this and afford additional protection."

Additionally, in its 1990 Olympic National Forest Land and Resource Management Plan, Final Environmental Impact Statement, the U.S. Forest Service has also determined many of these rivers to be eligible as a result of its own studies, including the Duckabush, Dosewallips, Gray Wolf, Elwha, Sol Duc, Bogachiel, Hoh, Quinault and South Fork Skokomish rivers. (Copies of the studies were sent to Nancy Hendricks on 09/05/06). However, since the major portion of some of these rivers lies within Olympic National Park, such as the Hoh, Quinault, Bogachiel and Elwha, the Forest Service has not performed any further analysis *and is deferring to the Park Service for any recommendation to Congress to include these rivers in the national Wild and Scenic Rivers system*. Also, the Forest Service notes in its 1990 plan that "the Queets (River), in all probability, meets the evaluation criteria for a Wild and Scenic River." However, since the Queets does not have a portion of its river corridor within the National Forest, the Forest Service is deferring to the Park Service for a recommendation to Congress for this river as well.

The Olympic National Park draft plan should make concrete recommendations to Congress on which rivers to include in the national Wild and Scenic Rivers system. Detailed eligibility studies of Olympic's rivers have been completed by the Forest Service, and the Park Service has made its own preliminary analysis, providing a solid basis upon which to make recommendations. The Park Service should recommend the rivers that it has already found eligible in the preliminary analysis and/or that the Forest Service has found eligible (including but not limited to those enumerated above), for inclusion in the national Wild and Scenic Rivers system.

If the Park Service believes it needs to do a further round of detailed eligibility studies before it can make recommendations to Congress, it is required under the Wild and Scenic Rivers Act and Olympic National Park management policy to do so as part of this planning process, as noted above. Additionally, the fact that the Forest Service is deferring to the Park Service for any further studies and recommendations to Congress on Wild and Scenic Rivers adds even more urgency to addressing this issue during the current planning process.

Wild and scenic rivers was identified by the public in the scoping process for the Olympic National Park general management plan as far back as 2001, as a topic that should be included in the plan:

"The GMP should include an inventory of the Park's 11 major river systems to determine their eligibility for inclusion in the national Wild and Scenic Rivers System. The plan should include the Park's recommendations to Congress. The Forest Service completed its assessment as part of the Olympic Forest Plan in 1990, but the Park is the major caretaker for the peninsula's rivers... With the fate of salmon stocks at issue, future designations – and resulting river-specific, multi-agency management plans – may play key roles in preserving salmon habitat peninsula-wide." (Olympic Park Associates letter to Cliff Hawkes, October 10, 2001)

Proposed Alternatives

We are also very concerned about several aspects of the Preferred Alternative (D) in the draft management plan, particularly its overall emphasis on visitor access and retaining road access in river corridors, vs. protecting natural river processes and critical fish and wildlife habitat, including spawning grounds for endangered salmon. We are concerned about the lack of designated river protection zones (as proposed in Alternative B) in the Preferred Alternative. As noted in the draft plan, "Water could be considered a unifying theme on the Olympic Peninsula." Many of the rivers on the Olympic National Park are large, wild, dynamic rivers containing some of the best remaining habitat for ESA-listed fish. The U.S. Forest Service's 1990 Land and Resource Management Plan for the Olympic National Forest notes that fish are an "outstandingly remarkable value" that qualifies the Hoh, Quinault, Dosewallips (regionally significant), Duckabush, Dungeness, Gray Wolf, Humptulips, Sol Duc, and Wynoochee Rivers for Wild and Scenic status.

Protection of these species and the river corridor should be the highest priority. Maintaining year-round road access in river valleys such as the Hoh, Quinault, Queets and Dosewallips through bulldozing, placement of rip-rap and other means can have serious adverse impacts on listed species.

We support protection of five key watersheds and critical fisheries habitat through expansion of the Park's boundaries, as proposed in Alternative B. The Preferred Alternative leaves out important protections for the Hoh and Quinault river systems.

We appreciate the opportunity to comment on the Draft General Management Plan. American Rivers' staff enjoys good, long-standing relationships with Olympic National Park staff, and we look forward to continuing to work together to protect and educate the public about the park's outstanding river resources.

Sincerely,



Bonnie Rice

cc Nancy Hendricks, Olympic National Park