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MERRILL & RING

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September 5, 2006

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

Dear Mr. Laitner:

I previously submitted comments regarding the Draft General Management Plan (DGMP) for the Olympic National Park (ONP). I am writing to give you a new proposal for the proposed boundary expansions at Lake Ozette.

Merrill & Ring is the predecessor owner and current manager for timberlands owned by former partners R.D. Merrill Company, Ring Family Limited Partnership, and JLCG LLC. In total the companies own about 60,000 acres of forest land in Washington, most of it on the Olympic Peninsula. Nearly 8000 acres are located within the proposed Lake Ozette park boundary expansion. An additional 800 acres are within the proposed Lake Crescent park boundary expansion.

We generally oppose the proposed expansions of the ONP boundary in the Lake Ozette and Lake Crescent areas as shown in the DGMP. Our lands within the proposed expansion and elsewhere are actively managed for timber production. While the lands are productively growing forests they cannot be considered wilderness, pristine, or of any exceptional quality for which National Park status is appropriate. As forest landowners for over 120 years we hope to accumulate additional lands and grow the industry, not diminish it through large sales of productive assets.

We would consider the trade of several small tracts in the Lake Ozette area, and request that you analyze this counter-proposal in the final draft of the management plan. Properties that we would take in trade would need to be of equivalent value. The specific proposal is as follows:

Portions of the JLCG ownership in Township 30 North, Range 15 W, Section 10, the northerly $\frac{3}{4}$ of the Northeast $\frac{1}{4}$, not including the existing rock pit and lands to the south of the rock pit. An unrestricted easement to the retained lands would also be retained.

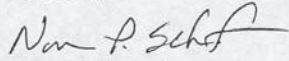
Portions of the JLCG ownership in Township 30 North, Range 15 W, Section 11, lying westerly of the Swan Bay Road and logging access road.

Portions of the R.D. Merrill Company ownership in Township 30 North, Range 15 W, Section 14, the North ½ of the Northwest ¼ lying westerly of the logging road.

In addition to this proposal, please present more clearly in the Draft General Management Plan the numbers of acres proposed for boundary expansion and Legacy Forest in each of the alternatives and regions. The data as it is currently presented is vague, confusing and potentially misleading.

Thank you for the opportunity to review and comment on the Draft General Management Plan for the Olympic National Park. Please feel free to contact me if you have questions about any of these comments or wish to discuss this proposal.

Sincerely,



Norm P. Schaaf
V.P./Timberlands & Administration