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Sept. 14, 2006

Carla McConnell
Olympic National Park – GMP
National Park Service
Denver Service Center – Planning
P.O. Box 25287
Denver, CO 80225

Re: Review of Draft Olympic National Park General Management Plan

Dear Ms. McConnell:

As an appreciator of National Parks and a crafter of documents, I am grateful for the efforts of all those who created the draft General Management Plan (GMP) for the Olympic National Park (Park), especially in developing the desired conditions. I also thank you for genuinely considering these comments.

While I understand that my contact information still may be disclosed via FOIA requests, I ask that you please keep my contact information private.

The four alternatives – no-action/status-quo alternative (A), resources-protection-emphasis alternative (B), visitor-opportunities-emphasis alternative (C), and middle-ground alternative (D) – seem to fulfill the NEPA requirement to develop and assess a range of alternatives. It's no surprise that the Park selected Alternative D as the preferred alternative.

Concern 1: A major concern is that **visitor experience is stated as the primary purpose of the Park, superseding protection of natural resources and Wilderness** to the extent that the latter will be compromised to provide the former. Without the existence of natural resources and wilderness, there would be nothing for the visitor to experience. If we do not safeguard the underlying resources that create the qualities that draw visitors, the Park and the National Park Service (NPS) ultimately will lose the visitors – and the revenues they generate – along with the resources. To preserve the fundamental resources and uphold such Park claims as protecting “the largest population of Roosevelt elk in its natural environment in the world,” protecting “some of the finest remaining stands of old-growth temperate rainforest in the United States,” and protecting “the primeval character of one of the largest wilderness areas in the contiguous United States,” the NPS should protect and maintain natural resources, Wilderness, and related qualities above all else, including the visitor experience.

Case in point for the above concern includes Pages 40-41 where more emphasis is given to visitor experiences (four points) than to natural resources (one point) and wilderness (three points). On Page 63, only one of seven factors focuses on natural resources and four factors focus on visitors to determine benefits and disadvantages of the alternatives. Even the fundamental documents of the NPS, including the Organic Act and the General Authorities Act, set forth the mandate to conserve Park resources and values – and you must have the former to provide some of the latter. It was the Park's resources and features themselves, not visitor opportunities or tourism, that captured the attention of the people who first sought to preserve the Park.

Concern 2: A second, related concern is that the **combined, incremental, cumulative effects of actions are disregarded**. If all negative actions determined to be of minimal impact continue to be assessed and implemented without determining the **collective** effects over time, eventually the character of the resources and the Park will be so altered, exceeding threshold levels, that the resources and the Park will not be recognizably sustained as the valued place for which the Park was established. Those of us who visit National Parks and similar areas have witnessed this firsthand as increasing numbers of people come to the relatively few areas that

ostensibly have been established to provide both resource protection and visitor opportunities. Case in point, on Page 48 a “negligible” effect of actions is determined regarding natural or depletable resources requirements and conservation potential, yet how many times will this determination be made before we have completely lost the natural soundscape or lightscape/night sky that originally existed?

Concern 3: Instead of focusing on benefiting Park visitors, **Wilderness management (beginning with Page 26) should focus on maintaining the integrity of the wilderness itself**, including the resident flora and fauna that require wilderness to survive. True wilderness no longer exists if the original wilderness wildlife, habitat, and character disappear. We all know that some wilderness/backcountry areas already are experiencing overuse and abuse by human visitors, as evidenced by shortcut paths, erosion, trampled vegetation, sites denuded of vegetation, and sites stripped of woody debris and snags. Again, if the Park does not maintain wilderness habitat for its wild residents, all that the wilderness concept embraces will be lost. Sometimes the best way to appreciate and enhance wilderness is to refrain from setting foot in every portion of it. Repeatedly I have seen people visiting Olympic National Park who think themselves above the rules as they deliberately go off trail, despite signage to the contrary. Human nature being what it is, it is virtually true that the more the NPS opens up Wilderness and provides for or caters to visitors, the more quickly the Park will cease to provide even the Wilderness values mentioned in the Plan, including naturalness, wilderness experience and opportunities for solitude, and opportunities for primitive, unconfined recreation.

Concern 4: Because 95% of the Park also is designated as Wilderness, certainly **the Wilderness Act should be cited (see Page 33) as one of the laws, regulations, and guidelines that the NPS is to follow**. Particularly regarding Olympic National Park, the Park and wilderness essentially are inseparable. Once again, the Park is primarily a wilderness/backcountry Park by design, yet under “Planning Issues” on Pages 40-41 more emphasis is given to visitor experiences (four points) than to wilderness (three points) and natural resources (one point).

Concern 5: **With both facilities and partnerships, the potential unfortunately exists for the Park to place facilities’ or partners’ needs above the need to protect natural resources, Wilderness, and associated qualities and characteristics**. Having visited a number of National Parks, I sometimes had to remind myself that I indeed was within a National Park because the commercial/concessionaire presence and emphasis was so overpowering. I also had unpleasant experiences with some concessionaires, for whom revenues invariably are the bottom line. A park’s entire character can be altered by partners who have their own agenda, especially those who are near or within the park or those who seek control of key sites. Careful selection of partners would be crucial to ensure that Park resources and associated qualities are not infringed upon. Sometimes mass-transit access to overcrowded sites is needed, but such transit should be electric-powered rather than gas-powered because diesel fumes in particular are very noxious, even to normally healthy people.

Concern 6: For a number of reasons I continue to be **amazed that stock use is permitted within the Park and that so many trails are open to stock**. 1) No apparent, on-the-ground provisions are made to ensure that non-native plant species are not introduced to the Park via this avenue. Due to ruminants’ digestive systems, simply asking stock owners to refrain from feeding non-native species to their animals while in the Park would not be enough. 2) Many trail beds take a beating because they cannot support the weight of or repeated use by stock. 3) Far too often people lead or ride their stock off the trail to go around bridges or actual obstructions, thereby creating erosion. 4) It is unnecessary and unpleasant for people to hike through dung. If stock use continues to be allowed, may I suggest that “slung-on poop bags” be required to capture the droppings of horses, burros, llamas, etc.? This at least would address both the problem of potentially introducing undesirable vegetative species and the problem of hikers having to tramp through stock dung.

Concern 7: I also am **astounded that campfires are permitted within the Park, period**. While I understand better than the average person that fire is part of most ecosystems, too many fires within the Park are human-caused. Not only are people careless and willful but drought conditions exacerbate the risk of wildfire. In addition, campfires require firewood collection, which leads to off-trail travel – causing trampling, erosion, and

radiating paths – and areas stripped bare of woody debris and even snags near campsites. (Within Wilderness on a National Forest, I recently helped extinguish an escaping campfire that had been smoldering for at least two days and was going deep as well as extending beyond the campfire ring. This firsthand experience reinforced that ignorance and negligence are too common to allow open fires in Wilderness and National Parks.)

Concern 8: With physical conditions that restrict my own activities, I think that **too much emphasis is placed on making the Park universally accessible.** Providing disability access to some sites is good but neither appropriate nor necessary to a great many sites. Today more people with disabilities may be interested in the Park, yet few would do much more than drive up the road to Hurricane Ridge to see the montane vistas, drive into the Hoh to see the rainforest, or possibly pass through the visitor centers. In a lifetime rarely have I encountered obviously disabled persons on even short trails. The draft Plan rightly acknowledges that “steep terrain and long distances naturally limit some visitors,” so it would be unreasonable to attempt to provide access to all areas of the Park. I would venture to say that most people with disabilities would be more than satisfied to have access to educational facilities, lodging, developed campgrounds, and short interpretive trails.

Concern 9: **The removal of approximately 50-100 hazard trees each year to maintain the Hurricane Ridge downhill ski area clearly indicates that site should be closed down.** Trees in the alpine-subalpine zone do not grow as large, as quickly, or as densely as those at lower elevations. At such a high rate of removal, it is only a matter of time before the area will be denuded of trees. Further, such commercial operations do not belong in a National Park. There are plenty of downhill ski areas in Washington State, the Pacific Northwest, and elsewhere for those who crave that kind of recreation. In contrast, Olympic National Park and the Hurricane Ridge area themselves are unique and irreplaceable.

Concern 10: As corroborated by two firsthand experiences in the Park this year, I think **uncommon or rare plant species are not being given proper management protection.** Some local visitors to the Park might comprehend why mountain goats were being harassed by a helicopter in the Switchback Trail area because such visitors are cognizant of the controversy regarding the introduced goats and endemic plants (e.g., Olympic bellflower, Olympic violet). However, I doubt that any visitors would understand why trail maintenance crews along the Happy Lake Trail lopped off nearly every specimen of candystick that I had seen growing alongside the trail earlier. So I would suggest that volunteers/contractors/seasonal employees be educated regarding what to watch for when conducting tasks with potential to harm certain plant species, such as brushing trails.

Finally, the selective perusal I gave the draft document indicates that more careful editing needs to be done to produce a more professional document. Just a few examples are: 1) Pages 3, 23-24 – Total number of endemic species apparently should be 24 rather than 23; 2) Pages 39 and 51– “Complimentary/compliment” should be “complementary/complement”; 3) Page 39 – Paragraph regarding draft Comprehensive Conservation Plan needs to be updated, as it states “... will likely be finalized by early 2006.”; 4) Pages 55 and 207 – “Comprised of” should be “composed of”; 5) Page 113 – Either “in” or “on” should be eliminated in first paragraph; and 6) Page 208 – Surplus “to” should be eliminated from last sentence of first paragraph, along with superfluous “the” in second sentence under “Cumulative Effects.” I would advise checking the entire document for all occurrences of several of the above verbiage situations.

Most of the people I have known well in my life would agree with the comments I have shared, so I trust you will take them seriously. As my comments indicate, because the GMP will be the foundational document for managing the Park over the long term, I and others ask that the Park be managed primarily to preserve wilderness and other natural resources, rather than to promote visitor opportunities or tourism.

Sincerely,

