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## Government Agency Comments

### Comment 499–City of Forks

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

28 Sep 2006

(Also sent via fax and e-mail to ensure receipt)

On behalf of the City of Forks, the following comments are submitted with regard to the Olympic National Park's draft *Draft General Management Plan/Environmental Impact Statement*. The adoption of a general management plan (GMP) by the National Park Service (NPS) for the Olympic National Park (ONP) will be a milestone event having implications and impacts upon the Westend (Western Clallam and Jefferson County) for decades. The comments provided below regarding the draft GMP are divided into two categories: General/Overriding Comments; and, Specific/Technical Comments. Specific themes noted within the General Comments will be further explained in the Specific/Technical Comments as they relate to specific proposals within the GMP.

**GENERAL COMMENTS**

The National Park Service at Olympic National Park (ONP) has the responsibility of protecting unique resources and wildlife while ensuring a quality experience for all park visitors. Given this, we submit the following comments on the Park Service's draft general management plan for Olympic National Park. Specifically, we believe the NPS would be better served with a final GMP that emphasizes the development of appropriate visitor facilities; expanded ranger programs; realistic and limited boundary adjustments; and, strengthened Park Service/community relationships.

Visitors that come to the ONP expect useful, appropriate and safe facilities that are adequately staffed providing modern, up-to-date interpretive materials and services. Yet, many facilities in the ONP are in desperate need of renovation, expansion or modernization, despite the heroic and tireless efforts of ONP staff to keep such facilities useable and open. It is imperative that the final GMP place paramount emphasis and duty on improving visitor access and park visitor experiences. This can be accomplished by augmenting existing infrastructure, where practical, with facilities such as additional bike paths, new trails such as the Spruce Railroad Trail, expansion of the lodging seasons, the development of new campground sites, developing access for retirees and seniors, and modernizing existing facilities at such places as the Hoh River.

We also believe that we need to reverse the systematic decline of what is nearly an endangered entity within the ONP – interpretive rangers and their associated program offerings. Visitors expect more from the NPS than large crowds of visitors trying to huddle around a ranger who is

City of Forks ONP GMP Comments

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acting as an educator, interpreter, hike planner, camp ground fee collector, etc. Many middle-aged frequent NPS visitors will recall, and hope to partake, in such things as evening campfire talks and guided hikes. Yet, such programs are becoming increasingly rare, and as a result a truly profound and unique opportunity is lost by the NPS to develop with visitors a greater connection and appreciation for the ONP and the Service. In addition, the potential to attract visitors to the ONP's gateway communities in future trips may also be lost. There is no doubt that longer-stay and return visitors are good for local communities that cater to visitor needs. Therefore, the final GMP must emphasize the need to fully fund and expand the park's interpretive programs, while maintaining and improving its current information centers. One of the "unique resources" of ONP is its rangers. We are adamant about the NPS having a duty to protect and increase the number interpretative and the backcountry rangers in the park. This should be a higher priority than large boundary adjustments and cooperative public/private conservancy efforts on lands adjacent to, but not owned by, the ONP.

We understand that there may be limited situations where there is a need to adjust the boundary of the park and land acquisition may take place. We will not support, and stridently oppose, any adjustments that would directly impact the economic viability of our community and the economic clusters of our region. Nor, can we support efforts by NPS to expand the boundaries of ONP areas when such a proposal would add additional regulatory burdens to private land owners. When land transactions occur, it must be with truly willing landowners who approach NPS. The transactions with such landowners should be the direct result of fair, good faith, 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. Put bluntly, NPS should focus its fiscal efforts on improving what it currently has rather than chasing additional acres it lacks the resources to manage.

Further, the NPS data, and analysis of the same, associated with the economic benefit of boundary expansions does not appear to comport with the *Information Quality Act* (44 U.S.C. Sec. 3516) 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. It also appears that the projected costs of the Land Acquisition/Boundary Adjustments lacks significant quality, reproducibility and reliability to be relied upon. Also, the analysis appears to lack objectivity with regard to the total economic impact of specific proposed boundary expansions at Lake Ozette. The City would specifically request correction of the presentation and substance of the economic analysis of the Ozette area boundary expansion.

The NPS must strengthen its working relationships with surrounding communities. In addition, we applaud the NPS for 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 as soon as possible. Focus should be placed on increasing the community's 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 salmonid 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 salmonid recovery.

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

#### SPECIFIC/TECHNICAL COMMENTS:

##### Proposed Parkwide Policies and Desired Conditions

1. Air Quality, pg. 13. We applaud the NPS recognizing that it could be a partner in efforts to develop “clean fuels” and where applicable alternative transportation systems. Such proposed partnerships need to be publically vetted to ensure that there is (1) mutual benefit to those involved; and, (2) little to no impact to (a) the public’s ability to access existing entry points; and, (b) the local communities in and about the park.
2. Ecosystem Management, pg. 16. Again, we applaud the final recognition of the ONP staff that they in fact have to “participate in collaborative planning efforts with adjacent land managers and tribal governments” when it comes to ecosystem management. However, the continual loss of ONP staff FTEs has resulted in the ONP missing opportunities to do what has been proposed specifically in regards to salmonid recovery planning efforts on the North Olympic Peninsula; and, also with regard to watershed based planning initiatives (WRIA planning) that have been underway for the past five years. In many ways, the ability of the NPS to share information in these initiatives has been severely limited by their lack of staff. This may also explain why specific documents were not reviewed or analyzed in the GMP, because NPS staff were in most cases unable to participate in the development of watershed resource inventory area plans, salmonid recovery strategies, etc.

Protection of viewsheds raises a concern in that ONP’s holdings within specific watersheds and/or viewsheds may be only a small portion of the total landbase. However, if ONP is now wanting to utilize its presence as a way of extending land use controls outside of the boundaries of its ownership, such an approach must be limited to ensure that any such activities do not adversely undermine the existing economic clusters of the watershed/viewshed in question. Nor, exert undue influence over local jurisdictions having regulatory authority in those watersheds. Efforts to prevent such impacts to adjacent landowners must be incorporated into the plan.

3. Water Resources, pg. 18. As noted above, ONP may have missed an opportunity to discuss and collaborate on the development of instream flows, water quality and water related habitat issues by not being able to participate in WRIA 19 or WRIA 20 planning efforts. The lack of NPS participation was specifically noted and raised on certain occasions as discussions involved the various rivers, as well as Lake Ozette, that originate and/or flow through NPS territory. In addition, because of the nature in which waterways originate in NPS uplands, flow through private and state ownerships, and discharge in estuaries in and adjacent to NPS shorelines, the NPS needs to further explain

what role it plans to play in water quality issues with regard to the strategy of attaining “the highest possible water quality standards available under the Clean Water Act.”

4. Rivers and Floodplains, pg. 19. The strategy of identifying “park or visitor facilities located within” 100-year and 500-year floodplains is a prudent risk management objective. However, the strategy does not clearly identify what exactly NPS will do with such knowledge. In addition, later discussion of facilities at Mora, Hoh, and other such areas that would be retained unless “lost to a catastrophic event” appears to indicate a want by NPS to identify potential sites subject to such catastrophes, but do little to plan for replacement, movement, or improvement of such facilities to reduce such catastrophic losses.
5. Native Species, pg. 23. The strategy to promote harvest and management practices that protect wild salmonids is admirable. However, it appears to be an effort by the NPS to insert itself into a well defined, and litigated, system of salmonid management that involves the State of Washington and the recognized treaty tribes of the Olympic Peninsula working together as co-managers of said resource. While the NPS may have interests in these activities, those interests must be treated similar as any other interested party. In addition, NPS should be cognizant that its role in proscribing management practices is to be limited to those portions of streams and rivers within its existing boundaries. Advocating for regulatory changes outside of the park boundaries on the manner of harvest regulations, seasons, etc., in effect interferes with the rights of state and treaty tribe co-managers acting to protect each entities specific management rights.
6. Wilderness, pg. 26. The strategy to develop research activities associated with “wilderness ecosystem and key natural resources” is again admirable. However, the ONP existing budget appears to have little room for such activities and the associated needed facilities to undertake such research.
7. Archeological Resources, pg. 28. There appears to be no strategy as to how the ONP will approach archeological resources that may become threatened due to the environmental conditions of the Olympic Peninsula. Reference to such threats are noted within the “Desired Conditions Specific to Olympic National Park.” However, there does not appear to be an accompanying strategy that outlines an approach to address such a threat.
8. Historic Structures and Cultural Landscapes, pgs. 29-30. One continual concern that we have heard is that the NPS does not adequately protect the prairies, former homestead sites, and pioneer settlement areas within its landbase. These sites and landscapes may no longer have specific historic facilities, however, the earlier historic role they played are still visible via the plants and trees that remain from those pioneer settlements. Efforts should be made to further protect these sites, and provide historic interpretation information about these sites. Specific settlement activities within what is now the NPS do not appear to be referenced or addressed within the desired conditions and strategies: Lake Ozette, Queets Colony, Quinalt Homesteads, coastal homesteads, and Upper Hoh areas.

We are also specifically concerned about the approach to “Mission 66” structures and how this approach could significantly limit the NPS from making much needed improvements to such facilities as the Hoh Rainforest Visitor Center. We believe that the time has come to replace this outdated and undersized facility, and its original interpretative models. However, the strategy articulated in this section could add additional prohibitions to undertake any such improvements.

We also believe that there should be a strong articulation of the philosophy noted on GMP 79 that “benign neglect would not be considered an appropriate management strategy.” This strong statement would be greatly appreciated by many of the descendants of individuals whose families settled areas now within the ONP’s boundaries. In addition, local communities should be consulted prior to the removal of any historic structure through active NPS action or approved natural decay.

9. Museum Collections, pg. 32. We support the strategy associated with inventorying the ONP’s collections. However, we would argue that this strategy is somewhat outdated in that it does not identify or discuss the possibility of sharing this inventory with a larger audience than those that come to the ONP HQ to access the inventory. We would advocate for the inclusion of a strategy that involves the sharing of the inventory, if not the actual item, via a digital facsimile. The Community Museum Project, of which ONP has played a significant and exemplary role, has demonstrated an ability to inventory, categorize and share with anyone having access to the internet never before seen materials in the ONP’s possession. While this project is just now being unveiled to the general public, it is quite possible that the ONP contributions to it will be used by students, enthusiasts, researchers and visitors to better understand the Olympic Peninsula. In addition, the digitization of materials allows for access and use of the material with no further damage or impact to the original item. Finally, if a catastrophic event were to take place that resulted in the damage or loss of the museum collections, the digital images could be utilized by future generations thereby “blunting the sting” of any such tragic loss. The ONP could partner with the University of Washington, Peninsula College, local school districts, tribal governments, and other entities to make this happen.
10. Visitor Use, pg. 33. One condition and/or strategy not fully discussed is how the GMP will ensure access to all generations of park users. The extension of wilderness and focus on additional wilderness experiences appears to be missing the growing demographic of “retiring baby boomers” touring the Nation’s park at a time in their lives where endurance hiking and recreating may no longer be physically possible or their primary objective.

While discussed in greater detail below, the visitor’s experience at the Hoh Rainforest is extremely limited by lack of modern facilities, outdated interpretive materials, and limited audio-visual presentation that introduces the visitor to the continental United States’ only temperate rainforest. A desired condition should be modernized facilities that can in fact accommodate not only the number of visitors, but wide varieties of visitors and their various interests.



Outreach programs developed by ONP should actively, collaboratively and repeatedly involve local schools, tribes, and community organizations in their development, testing, and offering. Efforts should be made to work with local entities, as well as the State Office of the Superintendent of Public Instruction, to ensure such programs are scalable to various grades while fulfilling various state learning objectives and standards.

Web-based education needs to be a must and could be done in collaboration with state and local innovators such as the Washington Digital Commons, the Virtual Community Museum Project, as well as national institutions. Such web-based educational offerings need to be made free to the general public.

#### Lake Crescent Boundary Expansion – GMP 34.

We do not see any analysis of the impacts associated with the loss of the existing lands in the Olympic adaptive management area of approximately 700 acres owned by the USFS. GMP 34. These lands are subject to limited silviculture treatments pursuant to the Northwest Forest Plan (NWFP) and “will be used to develop and test management approaches which meet ecological, economic, and social objectives.” We believe the GMP has not thoroughly analyzed the impact of the NWFP and its associated protections already in place in relationship to the lake habitat. Regarding the 80 acres of DNR owned trust lands, more information would be required to determine what deferrals are currently in place on those lands. As noted below, the proposed alternative and the analysis of the conversion of state, as well as the private, lands lacks any economic impact analysis to (1) local economies; (2) tax base; (3) regarding state trust lands, the beneficiaries of such lands; etc. In addition, the presumption that harvesting of timber on state and private lands pursuant to the existing regulatory standards would result in adverse impacts to Cutthroat and Beardslee trout spawning habitat lacks any scientific reference or data. Also, the lack of analysis of economic impacts similar to those discussed below, albeit smaller in scale, needs to be addressed by the NPS in the final plan.

#### Lake Ozette Boundary Expansion – GMP 35-36.

1. The GMP does not appear to clearly indicate the total amount of acreage by owner categories (e.g., state land, large private land owners, small private land owners) associated with each proposed boundary adjustment for each of the ONP regions. What summary of the acreage per area can only be found at pg. 372 of the document. It is odd that this information is not more clearly articulated earlier in the document. Nor, does it appear to indicate the extent in acres by owner categories for the proposed “cooperative private/public land conservancy strategies.” This information, provided by park area and by each alternative would have been very helpful in undertaking further analysis of the proposals. The numbers provided only address property acquisition, and not the acreage envisioned by the NPS for “cooperative private/public land conservancy strategies.”
2. The City renews its request that the Lake Ozette Boundary Expansion discussion be corrected to accurately, and without bias, present the total economic impact associated with the preferred alternative. The boundary expansion proposal includes the transfer of



60,000 acres of private, actively managed forest land that supplies timber to area mills. As explained later in the document, approximately 12,000 acres is associated with the Park boundary expansion, as well as 44,000 acres to be acquired and transferred to the State in exchange for the state deeding mineral rights to the NPS. The impact of this loss of timber supply source, is not even remotely discussed in the document. The proposed additional acreage would, according to some within the timber industry, be adequate to supply one lumber mill with enough product to maintain 100 employees. The removal of such a large volume of harvestable land would appear to have an economic impact that should be discussed as part of any alternative other than the "Alternative A – Current Management" proposal. Pages 35-36, M21-24, 91, 230-232, 268-271, 306-308, and 346-348 have no reference to any possible impacts associated with the conversion of the existing timber lands into parklands. NPS Staff have attempted to explain that any detailed economic analysis of alternatives would be done after an alternative is chosen for adoption and a final EIS is issued. However, that would appear to be different than the usual NEPA process where efforts are made to analyze reasonably expected impacts from the proposed action of the federal agency. As currently written, the draft does not provide sufficient information to allow officials to make a reasonable choice between alternatives. Without such information, it would appear that that EIS and any decision thereon could be set aside by a court.

An additional topic that is not fully discussed in the GMP is the impact the expansion and DNR-NPS exchange would have upon the tax base relied upon by local governments. The concern is generated by the fact that the property in question is currently privately owned and paying private property taxes. By changing the ownership to federal and/or state owners there will be a direct economic impact upon the various local governmental districts that currently receive taxes from these land owners. In addition, none of those recipients of such revenues were contacted for specific information about such revenues in the development of this element of the plan. No reference to local government consultation can be found within the document regarding the preferred Lake Ozette alternative. See DEIS pgs. 354-356. When NPS staff was asked as to whether or not such entities were contacted, they informed City staff that they would be in the future. Nor, is it a valid assumption that federal "payment in lieu of taxes" would offset the loss in revenues associated with the change in ownership, use and tax status. Congress has not reauthorized that legislation and it is our understanding that a significant element in D.C. that remains uncertain as to the long-term future of such funding.

In addition, there is no reference to the fact that even the proposed designation will result in increased regulatory compliance of private and state timber management in those areas designated for future NPS ownership. No discussion has been provided as to how the proposed designation could result in timber managers having to comply with "Class IV Special" forest practice requirements pursuant to Washington Administrative Code provisions found in WAC Chapter 222-15. Any such compliance requirements will reduce revenues to private shareholders as a result of the private companies having to expend funds to meet these additional administrative requirements.

In addition, the discussion of the local economy appears to be solely based upon a precursory utilization of the Census 2000 data. However, it does not appear that efforts were made to glean additional economic information and research from such sources as the State of Washington Department of Revenue, Department of Community, Trade and Economic Development, research entities at the University of Washington or Washington State University, nor the local economic development entities such as the federally supported Peninsula Development Authority, the various county economic development councils, and municipal economic development officials. Outreach to these entities could have resulted in a more thorough assessment of the economic situation on the Olympic Peninsula and could have provided background information needed to undertake an analysis of specific proposals upon local and regional economies. One document that might be of interest and relevance would be the Labor Market Analysis of Clallam County: A look at Wages and Employment between 1997 and 2004, Daniel A. Underwood and Dan Axelsen, 29 Jun 2005. This report did extensive county specific economic analysis of the changes in the timber, tourism, and other economic clusters in Clallam County. Consultation with the Clallam County Economic Development Council might have brought such a document to the attention of the Denver-based authors of the GMP.

Further, the failure of the GMP to undertake a thorough analysis of such economic impacts may have resulted in the NPS dismissing the need to comply with Executive Order 12898 – Environmental Justice. As we understand it, this executive order requires agencies to analyze their actions as to how they will affect communities that include minority and/or low-income populations. Western Clallam and Jefferson Counties fall within this description. However, the reliance by the NPS on multi-county statistics, and its failure to utilize readily available research at a more localized community level (See for example, Dr. Annabel Kirschner's Changing Conditions on the Olympic and Kitsap Peninsulas: 1990-2000 available on line at <http://www.crs.wsu.edu/outreach/ark/onrc/index.html>), appears to have resulted in NPS determining it did not need to comply with this Executive Order. The City of Forks' population in 2000 consisted of over 15% of the population being "Hispanic or Latino (of any race)", and 5% being "American Indian and Alaska Native". In addition, 14.6% of the families, and 20% of the individuals, living in Forks had incomes that were at or below the federal poverty levels. (Table DP-1 and DP-3, Geographic area: Forks City, Washington, U.S. Census Bureau, Census 2000).

Further, the draft GMP/EIS appears to emphasize possible improvements in the economic situation of the local communities by pointing to the various projects associated with implementing the GMP. However, in discussing those socio-economic impacts, there is no offset shown for the loss of jobs, direct or indirect, from timber management and harvest of those lands. As noted above, the proposed change in use of 60,000 acres of timber lands within Western Clallam County would have a significant impact on the available timber supply per year from private landowners. In a 1992 study of the impact of timber harvests to jobs undertaken by Richard Conway for the Washington Forest Protection Association and the WA Department of Natural Resources, it was demonstrated that approximately 8 direct jobs were created for every million board feet

of timber harvested. If that harvest was sustainable, those said jobs would be sustained as well. If the 60,000 acres would produce a sustainable harvest level of 30mmbf, then there is arguably 240 direct jobs associated with that acreage in Clallam and Jefferson Counties. It does not appear that any of the proposals, including the preferred, for the ONP's holdings in western Clallam and Jefferson counties would generate as many jobs as a result of implementing such proposals. Neither the GMP's *selected references* or *preparers or consultants* appears to include (1) third-party real estate appraisers, (2) economists versed in issues associated with the transference of land from managed timber to federal park designations; nor, (3) economists versed in the differences in direct and indirect job creation associated with specific land uses.

This request for correction is being sought pursuant to the Information Quality Act and the associated guidance provided to federal agencies by OMB due to the influential nature of the GMP.

3. The document fails to incorporate and review critical and historic documents associated with private and state timber land management that address concerns used to justify the land expansion. See pages 35-36, M21-24, 91, 230-232, 268-271, 306-308, and 346-348, 369-372. The specific documents that were not consulted or referenced with regard to their impact upon the lands proposed for NPS acquisition, or the concerns being addressed by NPS underlying the NPS proposal to acquire such lands include:
  - a. Washington State Department of Natural Resources Habitat Conservation Plan, Sept 1997. This document was approved by the federal services and addresses timber harvest activities, land management activities, conservation strategies for the Olympic Experimental State Forest which includes those DNR lands located in the Lake Ozette proposed expansion.
  - b. Washington State Forest and Fish Act adopted in 1999 by the State Legislature. This legislation requires timber land owners to take specific actions to address real and potential impacts to salmonid habitat across the State.
  - c. Washington State Forest Practices Habitat Conservation Plan, June 2006. A document signed by the Department of Interior and Commerce that provides an incidental take permit to the state for activities compliant with the State's forest practices act.
  - d. Washington State Department of Natural Resources policies and procedures associated with short and long term deferral of "mature (old-growth) forests".

In failing to consult these various forest practice related documents, the NPS may have obtained a false sense of urgency requiring the acquisition of additional property in order to protect species of concern. In fact, the above existing laws and agreements provide some of the highest level of protections ever in the State of Washington on private and state forest lands. By failing to consult these documents and analyze how they may increase protections on state and private managed timber lands, the NPS appears to have

rushed to judgment on the best means of providing perceived protections at an expense that may not be warranted to justifiable. In addition, some of the NPS perceived and projected future harms associated with legal timber management practices on private and state lands, (found for example at 202-203, 237-240, 325 and 370), appear to lack scientific data associated with those perceptions and projected impacts; or, in the alternative may rely upon scientific data that did not arise out of studies conducted after the implementation of the State HCP and the Forest and Fish Act.

The City would specifically ask for correction of this portion of the document to:

- reflect or cite the scientific data relied upon for these assertions;
- indicate whether the relied upon scientific data reflects the current forestry regulations in the state that have received federal services support; and,
- correct the document as necessary as a result of additional analysis undertaken with a thorough understanding of these critical documents as they relate to legal and permitted private and state harvest management activities.

4. DNR – NPS exchange. While the NPS is showing a level of innovation in proposing an exchange of lands between the NPS and the DNR as part of the Lake Ozette expansion, there are specific problems with the proposed exchange.
  - a. State forest lands (a.k.a. county trust lands or forest board transfer lands) would require specific state legislative action/authorization to permit any such exchange. See RCW 79.22.050, 79.22.060. Nor, would the proposed exchange comport with the one existing statutory exception to this prohibition on sale or transfer found at RCW 79.22.300. That exception allows state forest lands to be conveyed back to the benefiting county for county park usage with a right of reversion held by the state. RCW 79.22.300. There appears to be no reference to the need for state legislative action associated with any proposed exchange within the GMP. This oversight should be corrected.
  - b. The proposed exchange, specifically the proposed Legacy Forest elements, does not appear to comport with the Federal and State Habitat Conservation Plan and specifically the Olympic Experimental State Forest components. As noted in the HCP, a document that was not referenced or consulted apparently by the NPS (see pages 37-39, 393-398), the Olympic Experimental State Forest is to be managed as an “unzoned forest” which is described as “a forest in which no special zones are set aside exclusively for either species conservation or commodity production.” HCP IV.81. The proposed transfer of NPS acquired private timber lands in exchange for DNR lands and/or subsurface mineral rights owned by the State would appear to create a significant block with specific restrictions upon its management. Specifically, the GMP indicates that such a block would “involve an ecologically sustainable, best practices approach to forest management and could potentially be eligible for Forest Stewardship Council certification.” GMP 35. In asking NPS staff about this proposed exchange and whether or not it would be eligible for DNR regular management, the response seemed to indicate that this exchanged block would be subject to conditions and terms set by NPS.

The amount of this proposed transfer – being approximately 44,000 acres per the GMP at 379 – would be approximately 15-20% of the entire OESF. Such a bargain may run afoul of the HCP by creating a significant land mass within the OESF subject to different management requirements than the HCP and in effect zoning 44,000 additional acres in the OESF.

The issue of presupposing a level of conservation stewardship certification is addressed below. However, the phrase “an ecologically sustainable, best practices approach to forest management” appears to presume that the DNR is not already doing this. As noted, the DNR is subject not only to the referenced HCP, but also the various forest practices act requirements, and internal practices that could be argued to be the most protective forest practices laws and regulations in the nation. This specific phrase appears to reinforce our position that the GMP authors failed to consult, review and consider the application of the State’s Habitat Conservation Plan associated with DNR’s landbase.

- c. The GMP utilizes the term “Legacy Forest” and NPS staff (Richard Wagner) at the Forks Open House for the GMP noted that this was something proposed by Washington State Lands Commissioner Doug Sutherland. However, that is not an accurate reflection of what Commissioner Sutherland proposed and in fact, appears to either commandeer the Sutherland proposal, or confuse people regarding the intent of the NPS proffered block. The Sutherland “Legacy Trust” was one that would be actively managed per DNR’s regulatory and trust mandates for the purpose of generating new revenues for recreation and conservation. The Sutherland trust was a unique attempt to create a source of “continuous funding to support recreation on DNR-managed lands and to support stewardship for DNR-managed natural areas.” DNR FACT SHEET No. 02-143, 18 Sep 2002. The Sutherland proposal made it very clear that this trust would consist of lands comprised of “commercial forestlands” that would be part of the “working landscape” while generating revenues for a specific function “similar to how other state trust lands support specific beneficiaries such as schools.” *Id.*

The discussion of the Legacy Forest in the GMP, as clarified by NPS staff, does not appear to comport with the Sutherland proposal.

- d. Finally, and repeatedly, the proposed exchange lacks any economic analysis or discussion of beneficial or adverse impacts to the tax payers and/or trust beneficiaries. In addition, there appears to be no discussion of the value of the subsurface rights to ensure that any decision maker could understand whether a fair bargain was being proffered by the NPS to the State.
5. The extension of the “wilderness designation” and boundary to encompass 2<sup>nd</sup> and 3<sup>rd</sup> growth forests appears to be an act of misleading the public into believing that such managed stands would become wilderness in the future without some intervention. No detailed discussion appears to explain how such private and state commercial forest lands would be converted into either “wilderness trail”, “primitive wilderness” or “primeval



wilderness" zones. Much of the DNR holdings near the SE corner of Lake Ozette appear to be under 40 years of age and would take decades, if not centuries to develop into such zones. Yet, the plan does not discuss or address such issues.

6. The proposal, as discussed and explained on pgs. 35-36, appears to extend the ONP jurisdiction and influence even beyond the proposed boundary expansion. Specifically, the proposal speaks of protecting "the remainder of the Ozette Lake watershed," as well as other watersheds within the ONP, through private/public land conservancy strategies. This element of the proposal has no economic analysis upon its impact on the lands outside of the proposed NPS expansion. The City does not support efforts by the NPS to extend its land use authority over property it does not own and in effect expanding the park in all but name and deed.
7. Finally, the cost estimates for the land acquisitions are not realistic, reliable or even accurate reflections of the true costs. The City is expressly concerned about the alleged costs of the Lake Ozette acquisition, and the four proffered alternatives and specifically requests for a change of information based upon accurate, reliable, unbiased, and objective data pursuant to the *Information Quality Act (44 U.S.C. Sec. 3516)*.

The City believes that the data associated with the alternatives as summarized in Table 2 is inaccurate. Recent transactions in western Clallam County have established a price for the purchase of commercial timber lands of at least \$2,500 per acre making the Lake Ozette expansion much higher than the total figure noted in the table for land acquisition for the preferred alternative. In addition, recent ESA Section 6 allocations from the USFWS associated with Western Rivers and the Hoh River Trust would indicate that conservation measures discussed through out the plan and the preferred alternative to protect views would cost approximately \$2,700+ per acre to acquire. For the most recent announcement, please see USFWS Press Release 06-109, *SECRETARY KEMPTHORNE ANNOUNCES \$67 MILLION IN GRANTS TO SUPPORT LAND ACQUISITION AND CONSERVATION PLANNING FOR ENDANGERED SPECIES - Washington Grants Total More Than \$20 Million*, 26 Sep 2006. Finally, the DNR's 2005 appraisal, and the summary of that document entitled *05-07 Trustland Transfer Land & Timber Values*, for the Bite Hill Trust Land Transfer Project appears to affirm the City's position that the NPS project estimates are unrealistic. DNR estimated the value of the 355 acres that make up the Bite Hill project as totaling \$2.23 million. These 355 acres are a small portion of the proposed Lake Ozette expansion proposed by NPS and are located to the immediate S/SW of southern most point of the lake. From the materials, some of which was redacted, obtained by the City pursuant to a Public Disclosure Act request in July 2006, it appears that approximately 1/3<sup>rd</sup> of the Bite Hill parcel has recently (+/- <5 years) been harvested. An associated document, provided pursuant to the City's request of the DNR, notes that some harvest could be done within this stand pursuant to the HCP that could generate approximately \$30,000 per year from harvesting just ten trees per year. See memorandum entitled "*South Lake Ozette" parcel management plan for the OESF Dickodochtedar Landscape*. The information in this memorandum seems to imply that the July 2005 estimate for the Bite Hill acreage is probably at the lower end of the value scale. However, just using that 2005 estimate



found within the 05-07 Trustland Transfer Land & Timber Values, a figure of \$6,281 per acre would be an appropriate estimate for the Ozette region.

Using these three different sources, it is very easy to realize that the Ozette expansion is more than what is reflected in Table 2 of the GMP. GMP 64. That table estimates the costs of the preferred alternative's land acquisition to be between \$18-24 million. However, the City suggests the following table may more accurately reflect just the cost of the 12,000 acres of the Lake Ozette boundary adjustment – not inclusive of the 44,000 acres associated with the DNR-NPS exchange:

Basis for cost estimate	No. of Acres	Price per acre per basis for cost estimate	Formula	Total estimated cost for the Lake Ozette Boundary Adjustment/ expansion
NPS Lake Ozette Acquisition	12,000 acres*	\$300-400 per acre**	12,000 x \$300 12,000 x \$400	\$3.6m - \$4.8m
Recent Timber Acquisitions	12,000 acres	\$2,500 per acre	12,000 x \$2,500	\$30m
ESA Section 6 – Hoh River award	12,000 acres	\$2,700 per acre	12,000 x \$2,700	\$32.4m
2005 DNR Bite Hill Estimate	12,000 acres	\$6,281 per acre	12,000 x \$6,281	\$75.4m

\* For this table, we are only looking at the 12,000 acres to be added to the Ozette boundaries as described at GMP 372. However, Table 2 of the GMP (GMP 64) is reflecting a total cost inclusive of all acquisitions described on GMP 372.

\*\* This does not include the 44,000 acres associated with the DNR-NPS exchange, nor any estimates on costs for the public/private conservation initiatives on lands adjacent to the ONP's proposed holdings in the Ozette watershed. The amount of \$300-400 per acre used in this table is a result of taking the total of Alternative D for "Land Protection/Boundary Adjustments" (\$18-24m) and dividing that by the total additions found at page 372 including the 44,000 acres associated with the DNR-NPS exchange. Below is how that would be broken out in a somewhat similar table as above.

NPS Table 2 Total	59,940 acres	\$300-400 per acre	59,940 x \$300 59,940 x \$400	\$18m – \$24m
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The City would request, that pursuant to the *Information Quality Act*, this table's costs estimates for "Land Protection/Boundary Adjustments" be reevaluated for accuracy and objectivity, that the data be shared with the public that was used to determine the total amounts provided for each of the four alternatives, and if necessary, provide a peer review of such data to ensure its accuracy, reliability and objectivity.

Planning Issues – GMP 41.

ONP should be applauded for recognizing that it needs to develop partnerships to "protect park resources and provide for visitor enjoyment." GMP 41. However, it is interesting that there is no specific item that ensures that the Park work better with local governments to

create such partnerships. The issues associated with the “Tribal Relations” element could equally be raised and reviewed for gateway communities and county governments. We understand that the NPS has a specific, constitution and treaty-based trust obligation with the tribal nations of the Olympic Peninsula that is unique to those governments. However, we believe that the concepts noted in the “Tribal Relations” could be a frame work for the development of initiatives with local entities and the NPS.

#### Impact Topics

1. Without reasserting the concerns about the socio-economic analysis here for a second time, the City renews and reincorporates those concerns expressed above and reiterates the request for (1) changes to analysis and data, or lack there of, used in the GMP; and (2) further analysis of the economic impacts of the proposed boundary expansion on the economic base of Western Clallam County.
2. Without reiterating the position stated above, but reincorporating it here, the City believes that the NPS failed to comply with the wording and intent of Executive Order 12898 regarding environmental justice as it relates to minority and low-income populations of Western Clallam and Jefferson Counties. The boundary expansion could have a direct impact upon communities such as Neah Bay, Clallam Bay/Seki, Forks, La Push and Western Jefferson County. However, by amalgamating the four county’s population and economic data, the NPS appears to have avoided compliance with the executive order and some of the guidelines quoted in the GMP. GMP 47. The City requests that the data analysis be undertaken to look at its impacts within areas or regions of the Olympic Peninsula to determine if in fact the NPS correctly determined that environmental justice was a topic that did not require further evaluation by the NPS. GMP 48.
3. We are uncertain that the assumption that the plan would not impact unique farmlands is correct, for both the Alternative B and Alternative D for the Lake Ozette Region may in fact impact lands that were once farmed and could be farmed again. Further analysis may be required to determine if in fact the GMP has “no impacts on primary or unique farmlands” in the Ozette basin. GMP 49.
4. The City is not supportive of “further studies of eligibility” for Wild and Scenic River designation for the Bogachiel, Calawah, Sol Duc and Hoh Rivers. There have been previous, and very contentious efforts associated with such efforts to designate these rivers as “wild and scenic” in their entirety, or portions thereof outside of the boundaries of the ONP.

#### The Alternatives

The following comments are focused on specific ONP regions and the preferred alternative (Alternative D) as presented within the GMP. The issues of boundary adjustments are not reiterated below, as they were dealt with in great detail already.

1. Elwha – This area is outside of our City’s usual “sphere of concern.” However, one thing puzzled us regarding the CCC Campground site. M12 notes that the “former historic

CCC campground at Olympic Hot Springs would be rehabilitated with some sites removed.” We are concerned that the removal of camping sites within that historic property would reduce access to campers, while also altering a historic property that the GMP indicates the NPS is wanting to protect.

The establishment of the proposed development zone and day use in the Elwha area makes logical sense and provides a significant level of flexibility for the mark to (a) relocate facilities that may be lost in the natural processes that return to the river valley as a result of the Elwha Restoration Project; (b) allow for expansion of traditional camping opportunities; and, (c) allow for new infrastructure to be developed such as “pull-through” camping locations that could be utilized by the numerous recreational vehicles and travel trailers.

2. Lake Crescent – We support the designation of the environs along the North Shore Road and the Spruce Railroad Trail, and the East Beach Picnic area as day use. This recognizes what has in fact been the utilization of these areas for decades. It may also be logical to extend such day use designations, or seek the approval from Congress to do so, to Marymere Falls.

We also support the efforts to develop along Lake Crescent greater access through the NPS’ development of a universally accessible trail. However, any such trail must include an increased level of educational and interpretative information that currently exists about Lake Crescent.

As noted above, there is little in the way of interpretive and educational information about the geology, ecology, cultural and historical importance of Lake Crescent readily available to the visiting public. The GMP should consider developing specific locations on the west and east entrances to Lake Crescent that allow for automobile pullouts that provide some of this information to the visitors. Existing locations may be available for such activities, but would require the development of interpretative materials. Another option would be to utilize low range radio repeating broadcasts that provide such information to the visiting public.

3. Sol Duc – We support the additional area designated as “development zone” to the N/NW of the Resort. Here again this allows for the flexibility to relocate existing facilities if lost, or develop other access options such as low-impact campgrounds, pull throughs, etc. It also might be logical to extend day use designations, or seek the approval from Congress to do so, to Sol Duc Falls.

The pursuit of a seasonal transit system could provide another form of access to this region of the ONP, however, any parking facility would need to be secured in some fashion. In addition, the GMP does not appear to have designated any place within the region for parking and catching such transportation options.

Further clarification should be provided as to what factors will determine whether

facilities are relocated and/or expanded in this region of the Park, as well as its other regions.

4. Ozette – non-boundary adjustment issues, etc., already raised – We support the designation of the northern portion of Swan Bay as “day use.” However, we question why only minimum facilities would be provided at the associated boat launch that would be kept at this location. In addition to educational and interpretative information, visitor facilities such as privies, picnic tables, trash receptacles, etc., should be provided and maintained in this zone.

We are not supportive of the idea of closing the Rayonier Landing. Information provided to us by former Rayonier employees lend credence to the Ozette community’s position that this boat landing site was, is and should continue to be an access point to the Lake.

We believe that boating of all types should be permitted on the Lake. An we stridently oppose efforts by NPS to reinterpret the intentions of Congress regarding all forms of boating as noted in the Congressional Record of 1976 (Senate 1 Oct 1976 – Comments of Sen. Henry Jackson; and, House 29 Oct 1976 – Comments of Rep. Don Bonker). Boating, as used by both of these political advocates for the Ozette designation included both non-motorized and motorized boating activities. Any effort to prohibit motorized boating on Lake Ozette would not be consistent with the intent of Congress, would limit access and recreational opportunities, and would extend the wilderness borders of Lake Ozette without Congressional Action to the surface of the Lake.

We disagree with the proposal to redesignate and/or relocate camping opportunities now at the Ozette Campground to locations outside of the Ozette area of the ONP. Better utilization of the development zone at the western terminal of the paved road could result in additional, low impact camping sites. Under the proposed boundary adjustment there would be no other location near or overlooking the lake to camp that would be outside of the ONP.

We are uncertain how a universally accessible front country trail could be developed without designating additional area as either “development zone” or “day use.”

5. Mora – We support the designation of most of the area associated with the NPS portion of the Mora Road/Rialto Beach Road as “day use.”

We are concerned that the approach to Rialto Beach, following any catastrophic event, would be return to a “frontcountry accessible trail” rather than a universally accessible trail. As it currently is, Rialto Beach is one of the few places where individuals of nearly all ability can access the Pacific Ocean along the northern portion of the coast strip. In addition, all Rialto Beach facilities should be reestablished at a new trailhead if the existing facilities are lost in such an event.

We are also very supportive of the idea of a NPS-Quileute Tribe endeavor to provide boat or canoe service from Mora to La Push.

However, we are extremely disappointed that the ONP GMP does not discuss, nor provide possible solutions to, the decade running boundary dispute with the Quileute Tribe. While we are understanding of the continued efforts to resolve this issue, the GMP should indicate that some alteration, unknown or undesignated, could result into the boundaries of the ONP as a result of such a settlement. Failure to mention this issue, and articulate the NPS' intentions to resolve it, seems to undercut the goals articulated elsewhere within the GMP regarding a want by the NPS to improve its relationship with the Peninsula's tribal nations.

6. Hoh – We support the designation changes found within the preferred alternative in and about the Visitor Center and Campground. Such designations more accurately reflect the type of activities currently taking place in and about that area. The City looks forward to working with ONP staff, local community members, and other interested parties in the creation of a development plan for that portion of the ONP. We believe that such a planning process needs to be made a high priority by ONP.

We are extremely supportive of the identification of the need to relocate the existing roadway away from the Hoh River's meander areas and would work with NPS to seek any required Congressional approvals to make that a reality. Such an effort should be part of a larger effort that also looks at relocating portions of Jefferson County's Upper Hoh Road. In addition, the City would hope that the NPS would work with the local community to seek appropriate federal designation and appropriations to address repairs, improvements, and relocation of the non-NPS portions of that road segment.

We are extremely pleased to see recognition of the need to improve the Hoh Visitor Center. This building, part of the historic Mission 66 initiative, is no longer meeting the needs of the visiting public to this portion of the ONP. The facility, maintained as a result of heroic staff efforts, is too small for the number of visitors that utilize it each year, lacks adequate interpretative and educational facilities, and has aging infrastructure no longer adequate to meet the demands associated with current use. We believe that a facility could be constructed utilizing modern, low/no-impact building methods that could provide better services to the visiting public and reduce maintenance costs. It is our position that this should be the number one replacement priority within the ONP system, and the City would be interested in working with ONP and NPS Regional staff to pursue such an improvement. Until that facility can be constructed, we believe that the ONP should make an conscious effort to modernize the interpretative information within the existing building to better reflect current knowledge and best available science on the ecosystems in this portion of the ONP.

The concept of a seasonal transit system originating outside of the ONP deserves a significant assessment. However, we would not be supportive of any such system that would not allow visitors to visit existing businesses along the Upper Hoh Road. Any system would need to be develop in close coordination with the residents and business owners of the Hoh Valley and other interested organizations. The City would be very interested in participating in such a study.

One thing that does not make sense, however, is the lack of any development zone designation in the area designated as the “potential location for relocation of existing facilities.” We would be supportive of NPS efforts to seek congressional approval to modify wilderness designations for such a designation. At a minimum, some acknowledgement of day use in and about the trail head in that area should be reflected in the GMP.

7. Kalaloch – We support the increase in the development zone in and about Kalaloch Creek. Such a designation will allow for a modification to existing facilities, or the relocation of some of those facilities. We believe efforts should be made by NPS to designate the western terminal of the Oil City Road, and the associated trailhead located there, as either low use or day use. If Congressional approval to do so would be required, we would be supportive of efforts by NPS to seek such approval. This area is currently being used in that capacity and the GMP should recognize this fact. We also believe that the roadway and area in and about the “Big Cedar Tree” should be designated day use.

We are intrigued in the idea of a relocation of SR 101 in this area. The City would be interested in participating in any study or discussions of such a relocation and the various proposed routes.

We also are supportive of the proposal to create an appropriate visitors center in the Kalaloch area that would highlight the unique coastal elements of the ONP. In addition to cultural resources, such a facility could also highlight the historical maritime nature of the NW Pacific Coast. However, we believe that this should occur after addressing the critical needs at the Hoh Rainforest.

8. Queets – We believe that there should be some recognition of the campground and boat ramp as “day use” within the GMP to reflect how in fact that area is utilized. As noted earlier, additional interpretative information about the historical efforts within the valley to develop it should be addressed.
9. Quinalt – We support the idea of expanding visitor services within the watershed and agree that such facilities could be located outside of the ONP boundaries in conjunction with other partners.
10. Wilderness. Except for the wilderness extension to the proposed Lake Ozette acquisition, the City is supportive of the preferred alternative that in effect keeps in place the current management approaches .

#### Other Comments

1. Table 5: Park Watersheds, GMP 103. We are confused as to why information was “not available” for this table regarding “percent of watershed in the Park.” In addition to various local sources, such information could easily be obtained from a simple GIS inquiry.



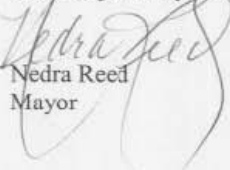
2. Olympic Peninsula Tribes, GMP 135. The paragraph regarding the “usual and accustomed areas” of the Quileute and Hoh Tribes seems to simplify, and may as a result inaccurately reflect these areas. In addition, it is our understanding that the Quileute and the Hoh Tribes have specific management rights and responsibilities for the specific drainages listed in this paragraph. It may need to be rewritten to better reflect these things.
3. Visitation, crowding, survey results, GMP 139. It is of no surprise to us that these surveys referenced the Hoh Rain Forest as a crowded area considering its visitor center was designed and built for some 15,000 visitors and receives nearly 16 times that number each year. As noted earlier, replacement of that existing facility needs to be one of the highest new construction efforts of the ONP.
4. Information, Orientation, and Interpretation (IOI)– general. One thing that we find peculiar is the lack of readily accessible interpretative information on the geology, ecology, cultural and historical aspects of the ONP at the various regions outside of the ONP HQ. While some kiosks do exist, as noted at GMP 146, there are not such kiosks at Lake Crescent’s parking lot and restroom facilities, at either entrance to the Lake, Mora and Rialto Beach, etc. In addition, it does not appear that the cultural and historical aspects of the ONP are provided at various locations. ONP is a crown jewel for its ecological attributes, but the cultural and historical aspects should not be hidden from the visiting public, but rather added to the many other remarkable gems in that crown.
5. IOI – Hoh. We will not disagree with the assessment of the Hoh Rain Forest Visitor Center found at GMP 147. We would only reiterate that because of these reasons a new visitor center is a must. We believe additional IOI resources need to be made available to the Hoh based upon the visitor center contacts noted within Table 7: annual recreation visits by district found at GMP 138. We feel that these numbers clearly argue for a higher priority for the replacing of the Hoh Rain Forest Visitor Center that can meet such a demand.
6. IOI – Kalaloch. We concur with this assessment as well, and second to the Hoh Rain Forest Visitor Center, and believe it too needs to be replaced.
7. IOI/Education. ONP should take a more active and engaged effort with gateway community school districts, and webbased learning providers, to develop curriculum that could aid student learning. Such activities would not only increase awareness of the ONP, but in all likelihood help develop the next generation of ONP visitors and users.
8. SocioEconomic Environment, GMP 163-173. As discussed elsewhere, the City believes that this element is precursory and does not accurately reflect some of the economic issues associated with the various subregions and gateway communities neighboring the ONP. This element needs to be thoroughly reworked to the point that every neighboring tribal nation, as well as each gateway community, is covered in as much detail as the Jamestown S’Klallam Reservation. While county-wide information may be accurate, it

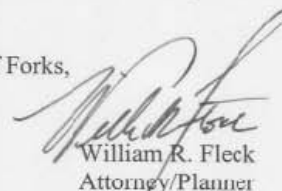
may hide disparities within each county between subregions. Such information is available and was publicly shared throughout the region a few years ago as a result of efforts by various local governments to look at the changes between census years. As noted above, the NPS should have availed itself of the local knowledge and research information undertaken as part of the various economic development initiatives within the region. However, for some unknown reason, only one specific jurisdiction was chosen for such an undertaking.

9. Forest Information Station in Forks, GMP 333. We are uncertain what is meant by "minimal interpretation and opportunities for visitors to learn about park and forest resources, and help with safe trip-planning." We are certain that this poorly worded reference to the Forks facility is not implying that the NPS staff that provide that information on a daily basis are providing "minimal" information. We strongly believe that this is one of the few places outside of the ONP HQ where a wide variety of services and information can be obtained with relative ease from some of the best informed, highly motivated, and easy to approach NPS staff in the ONP.
10. Impacts on the Socioeconomic Environment, GMP 346-348. Most of the significant, substantive concerns about this section were addressed elsewhere. However, there is no clear discussion of the loss of ONP staff over the past 30 years by area of function and duty. We believe that the general public probably should know where those losses have occurred, why they have occurred, and what impacts those losses have had on the local economy.
11. The GMP should include the latest "facility condition index" ratings for the ONP's various facilities. In addition, a discussion of the maintenance backlog for the ONP should be a significantly important appendix discussion to the GMP. Such an appendix would allow future generations to determine whether or not the adopted GMP in effect addressed these specific facility and maintenance related issues.

We appreciate the opportunity to provide these comments to the NPS on the Olympic National Park's draft General Management Plan. We look forward to working with the ONP as it develops a new chapter in its history on the Olympic Peninsula. We are hopeful that the ONP will continue to develop and engage its local communities in its development, management and operations.

Most respectfully submitted on behalf of the City of Forks,

  
Nedra Reed  
Mayor

  
William R. Fleck  
Attorney/Planner