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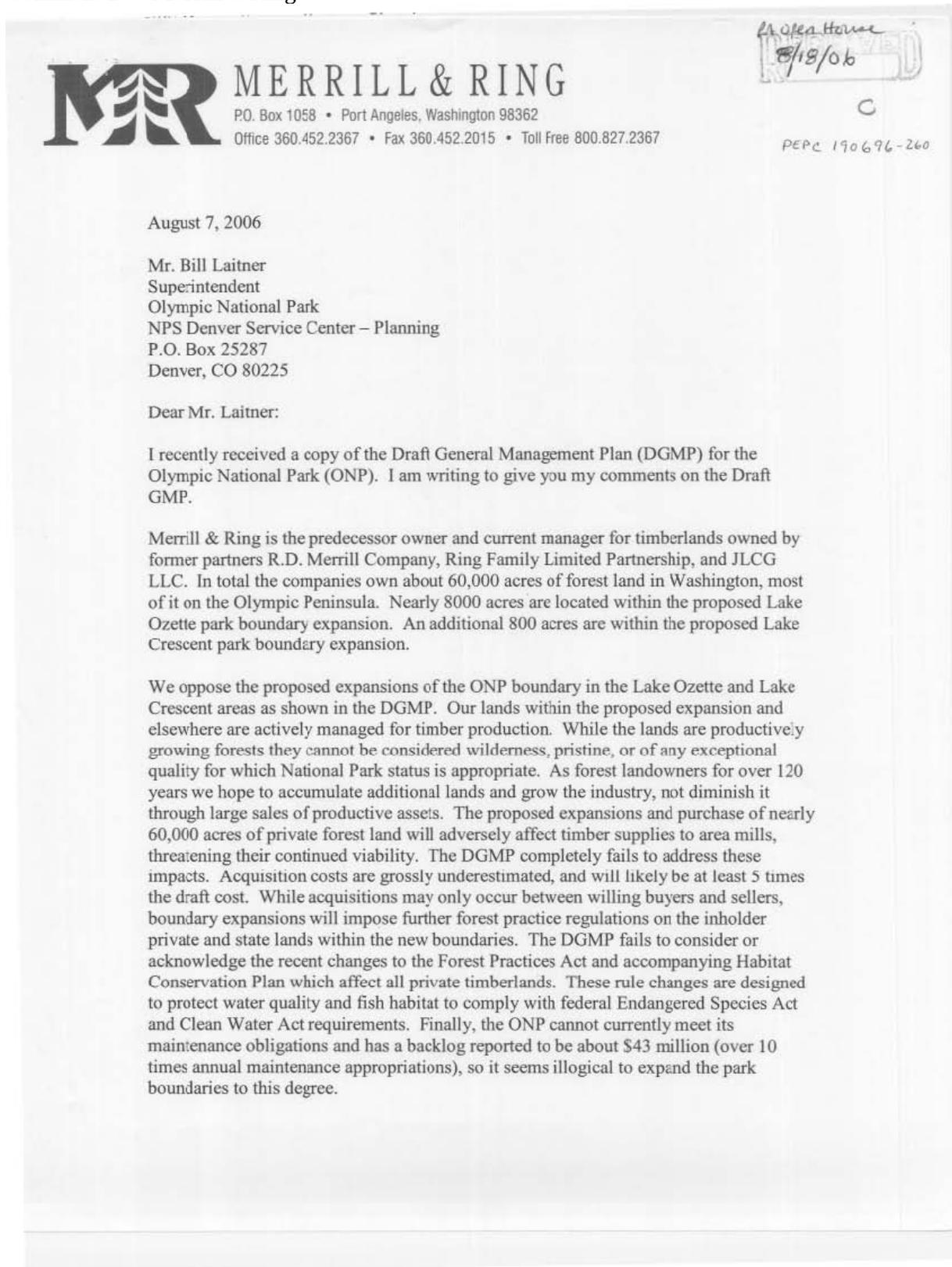
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Comment 260–Merrill & Ring



MERRILL & RING

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8/18/06

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PEPC 190696-260

August 7, 2006

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

Dear Mr. Laitner:

I recently received a copy of the Draft General Management Plan (DGMP) for the Olympic National Park (ONP). I am writing to give you my comments on the Draft GMP.

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 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. The proposed expansions and purchase of nearly 60,000 acres of private forest land will adversely affect timber supplies to area mills, threatening their continued viability. The DGMP completely fails to address these impacts. Acquisition costs are grossly underestimated, and will likely be at least 5 times the draft cost. While acquisitions may only occur between willing buyers and sellers, boundary expansions will impose further forest practice regulations on the inholder private and state lands within the new boundaries. The DGMP fails to consider or acknowledge the recent changes to the Forest Practices Act and accompanying Habitat Conservation Plan which affect all private timberlands. These rule changes are designed to protect water quality and fish habitat to comply with federal Endangered Species Act and Clean Water Act requirements. Finally, the ONP cannot currently meet its maintenance obligations and has a backlog reported to be about \$43 million (over 10 times annual maintenance appropriations), so it seems illogical to expand the park boundaries to this degree.

My detailed comments follow and refer to the DGMP page and paragraph/ table as noted. Some of the comments are repetitive in order to address each reference in the DGMP.

Page 34-35 – Lake Crescent Boundary Adjustments

R.D. Merrill Company owns approximately 800 acres within the proposed boundary expansion. An additional 160 acres are accessed by a road system that falls within the proposed expansion. Merrill's lands contain mature second growth timber planned for harvest and long-term management under our sustained yield harvest plan. All forest practices are regulated by the Washington Forest Practices Act. The rules and regulations recently received federal recognition in a Habitat Conservation Plan for compliance with the Endangered Species Act. The rules require significant buffers on all fish streams and non-fish perennial streams. Roads must be maintained to meet Clean Water Act requirements, including control of sedimentation and provision for fish passage at all stream crossings.

Merrill's lands are part of the Boundary Creek watershed and do not flow into Lake Crescent, home to Beardslee and Crescentii Trout. Forest Practices Act rules require landowners to upgrade all roads to current rule standards by 2016, or sooner if the road is used for hauling of forest products. These rules and timelines will likely result in better maintenance by Merrill than by the ONP, given ONP's current maintenance backlog.

Page 35-36 – Lake Ozette Boundary Adjustments

R.D. Merrill Company, Ring Family Limited Partnership and JLCG LLC all own lands within the proposed Lake Ozette boundary expansion, totaling about 8000 acres in Alternative B and about 5000 acres in Alternatives C and D. The lands contain a range of forest stands ranging from young reproduction to mature second growth timber planned for harvest under our sustained yield harvest plans. Contrary to the DGMP these lands do not provide a "natural setting" but have for many decades been part of long-term management. The existing scenic qualities, as viewed from Lake Ozette or elsewhere, reflect that management.

All forest practices are regulated by the Washington Forest Practices Act. The rules and regulations recently received federal recognition in a Habitat Conservation Plan (HCP) for compliance with the Endangered Species Act. The rules require significant buffers on all fish streams and non-fish perennial streams. Roads must be maintained to meet Clean Water Act requirements, including control of sedimentation and provision for fish passage at all stream crossings. Forest Practices Act rules require landowners to upgrade all roads to current rule standards by 2016, or sooner if the road is used for hauling of forest products. These rules and timelines will likely result in better maintenance by Merrill & Ring than by the ONP, given ONP's current maintenance backlog. In addition to standard forest practice rules, Merrill & Ring is participating in the recovery planning process for the Lake Ozette Sockeye salmon. This process has identified limiting factors for the species and is currently developing recommended recovery plan objectives. The recovery plan, in conjunction with the Forest Practices Rules and its Habitat Conservation Plan will protect Lake Ozette Sockeye.

On page 36 (first paragraph) the DGMP states that “Recurring timber harvesting adjacent to these areas could result in highly visible clear-cuts, wind throw ..., the loss of important wildlife habitat..., and increase sedimentation...” However, the DGMP provides no documentation that any of these potential effects have actually occurred, even though the subject lands have been actively managed for many decades. Current forest practices rules require maintenance of critical wildlife habitats and stream protection. Portions of harvest units may be visible but are buffered by the existing park lands that surround the lake.

The DGMP proposes that the Washington Department of Natural Resources (DNR) will acquire a large forest block from the current private landowners. These lands will then be designated a “Legacy Forest”. The ONP doesn’t have the authority to specify what type of management DNR may utilize on its lands. The DNR is obligated, by the state constitution, to manage to benefit the trusts. This has been narrowly interpreted by the courts to include full fiduciary responsibility, not preservation.

Page 48 – Low Income/Poverty Populations

The third bullet states incorrectly that minority or low-income communities would not be affected. On our lands and much other private timberland leases are granted to harvest ferns and boughs. This work is done almost entirely by minority and/or immigrant residents. If the Lake Ozette boundary adjustment occurs, harvest in these bough-producing areas will cease, putting many low-income workers out of a job.

Page 64 – Table 2

The last line of the table indicating costs of boundary adjustments grossly underestimates the cost of acquiring land. Recent transactions of large blocks of timberland, i.e. the former Crown Pacific/Cascade Timberlands property in northwest Clallam County indicate prices of \$2500 per acre or higher. Sales of smaller tracts usually achieve higher values. Lands with significant amounts of mature timber will also be more costly. The purchase of around 60,000 acres indicated in Alternative D will likely cost at least \$150,000,000, over five times the DGMP estimate. The other alternatives will be similarly affected.

Page 86 – Table 3

The NEPA Section 101(b) Goals indicate in E “Achieve a balance between population and resource use that will permit high standards of living...” The DGMP fails to address the loss of jobs and displacement of workers that will occur if park expansion plans are fulfilled.

Goal F states “Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.” The DGMP fails to address the removal of up to 60,000 acres of commercial timberland that produce renewable products. Reductions in wood supply raise prices, causing mill closures and greater reliance on alternative products, nearly all of which are non-renewable and depletable.

Page 320 – Fish and Wildlife

The first paragraph discusses beneficial impacts to fisheries from park expansion into the Lake Crescent and Lake Ozette areas. However, the DGMP does not acknowledge the current Washington Forest Practices Rules and Regulations, the recently approved Habitat Conservation Plan for all aquatic species, or the requirement that forest landowners complete road maintenance plans by 2016. All of these will result in improvements to fish and wildlife habitats and to water quality. The ONP has no obligation to complete its backlog of maintenance projects, and current funding falls far short of meeting even current needs. It is probable that park expansion could result in adverse impacts to fish habitat and water quality.

Page 320 – Cumulative Effects

The fifth paragraph states, without any detail or corroborating evidence, that “Adverse impacts on wildlife are occurring in the Olympic region as a result of logging... Changes outside the park from these activities continue to adversely affect terrestrial and freshwater habitats in the park...” As noted above, the DGMP completely fails to acknowledge or address the Forest Practices Rules, HCP, DNR HCP, and other actions timberland owners take to improve habitat and manage for wildlife. With any action there are effects that may benefit one species or ecotype while damaging others, and where some others have little or no impact. The DGMP needs to avoid making broad generalizations about adverse effects and identify which species may benefit and which species may suffer from a particular action.

Page 320 – Conclusion

The park expansion proposed in the Preferred Alternative D will not have long-term benefits to wildlife and fish, compared to continued ownership and management for commercial timberland. There could be both short and long-term adverse impacts to fish habitat and water quality resulting from lack of proper maintenance if the current budget shortfalls continue.

Page 321 – Special Status Species

Paragraph five indicates that implementation of alternative D “would result in long-term moderate beneficial impacts on special status fish, including the Lake Ozette sockeye, and critical habitat in these watersheds.” There is nothing to back this claim. The DGMP must acknowledge the impact of the Forest Practices Rules, HCP, the current Recovery Plan process, and the ONP’s own failure to adequately maintain the facilities and roads it currently owns.

Page 322 - Cumulative Effects

The fourth paragraph is not true, especially given the new Forest Practices Rules and the HCP. Contrary to the last sentence stating “Habitat in the park could become some of the only remaining quality habitat on the peninsula”, many area rivers, including especially the Pysht River, have benefited from extensive habitat restoration projects and have salmon populations higher than any measured stream in Olympic National Park. Once again the DGMP draws broad generalizations that are judgmental, not backed by evidence, and in many cases false.

Page 323 – Impacts on Wilderness Areas

In the second paragraph the DGMP states “boundary expansion could aid in protecting wilderness characteristics. If areas within boundary adjustments are determined to be suitable for wilderness, wilderness opportunities in the park would increase.” The proposed expansion areas at Lake Ozette and Lake Crescent have experienced forest management activities for decades, including road construction, harvesting, planting, thinning and brush control. They are not suitable wilderness. The DGMP needs to be specific about what lands are considered to be of wilderness quality.

Page 339 – Ozette, Access

The DGMP states “a modest boundary change would be proposed to provide public access along the eastern shoreline of Ozette Lake.” The existing roads provide access to lands being considered for park expansion and additional timberlands beyond the proposed boundary. How will park visitor use be managed alongside industrial forestry use? Improvements of the current roads, or alternatively, construction of new roads, will have some adverse impacts on the lands the DGMP proposes to protect. Roads that currently serve industrial forestry operations must not be modified in any way that adversely affects the forestry operations.

Page 348 – Impacts on the Socioeconomic Environment – Conclusion

The DGMP completely fails to address the adverse impact on family-wage jobs resulting from park expansion removing commercial timberland from the region. The 60,000 acres (including both park expansion and “Legacy Forest”) could produce approximately 60 million board feet of logs per year, sustainable forever. This volume is around one years supply for any of the modern mill facilities on the north Olympic Peninsula. How many direct jobs will be lost (loggers, truck drivers, tree planters and thinners, mill workers, mechanics, foresters) if the park expansion proceeds? Which mills will be required to curtail operations due to lack of supply, and how will that affect their viability? The DGMP has addressed only the positive impacts of additional park employees, at the expense of the taxpayer, without considering the adverse impacts to the businesses that generate jobs that produce those taxes.

Private timberlands pay annual property taxes to the County, along with harvest excise taxes when trees are harvested. Timber sales from DNR lands are also taxed, at the benefit of the County. If park expansion plans proceed, removing 60,000 acres from currently managed commercial timberland, how will those tax revenues to the County be replaced? If they are not replaced, what will be the impact on the County and the services it provides to citizens?

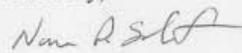
Conclusion

Merrill & Ring opposes all of the alternative park expansions described in the DGMP. We are not interested in selling our lands or seeing them included within an expanded boundary. The DGMP has failed to acknowledge the benefits to fish and wildlife habitat and to water quality resulting from current Forest Practices Rules and the HCP. The document also fails to recognize the adverse impacts of park expansion on the

socioeconomic environment, including losses of family-wage jobs. The DGMP makes numerous broad, unfounded and undocumented generalizations about benefits to fish and wildlife, without recognizing adverse impacts resulting from inadequate park maintenance.

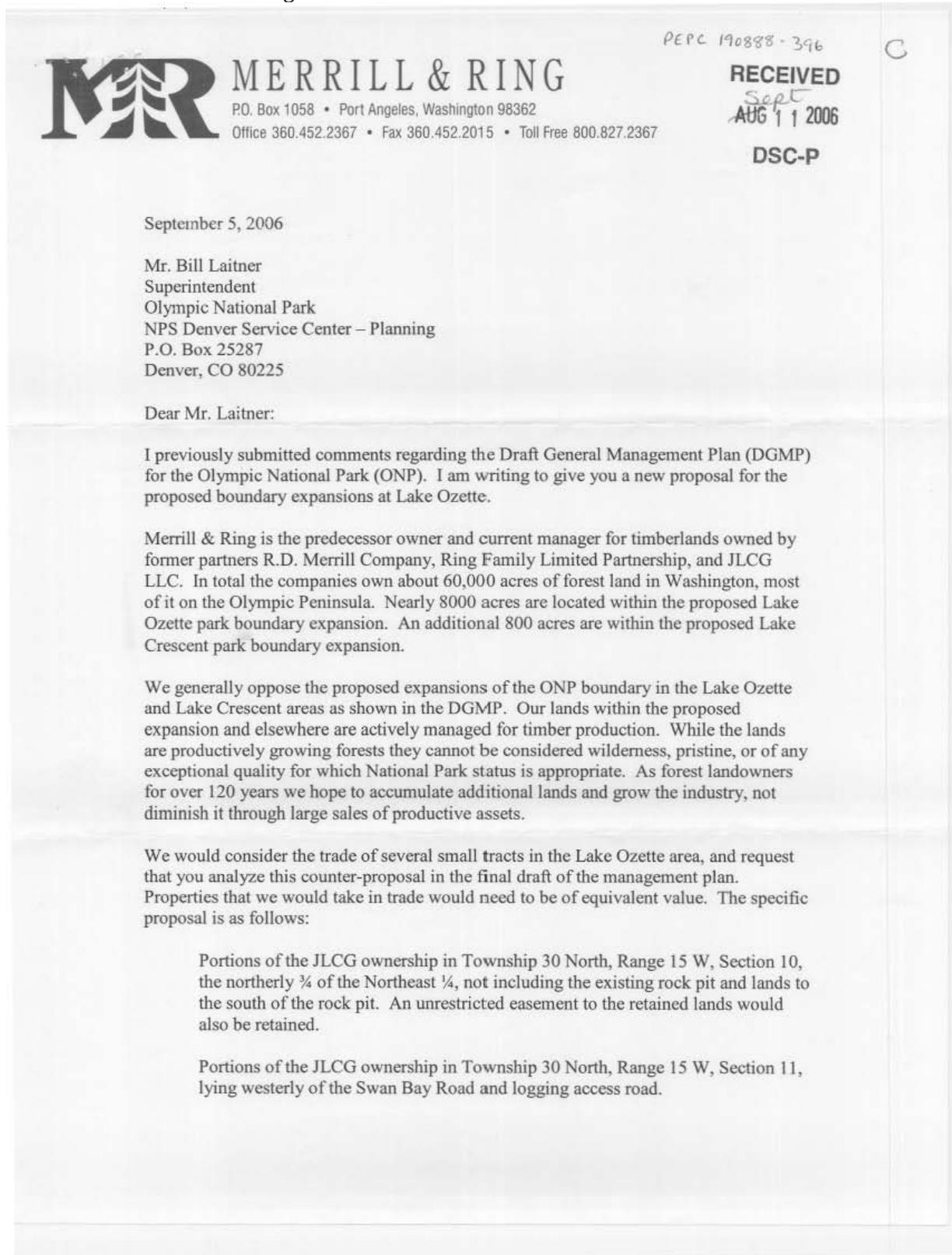
Thank you for the opportunity to review and comment on the Draft General Management Plan for the Olympic National Park. Please feel free to contact me if you have questions about any of these comments.

Sincerely,



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

Comment 396–Merrill & Ring

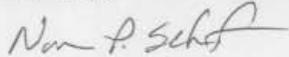


Portions of the R.D. Merrill Company ownership in Township 30 North, Range 15 W, Section 14, the North  $\frac{1}{2}$  of the Northwest  $\frac{1}{4}$  lying westerly of the logging road.

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.

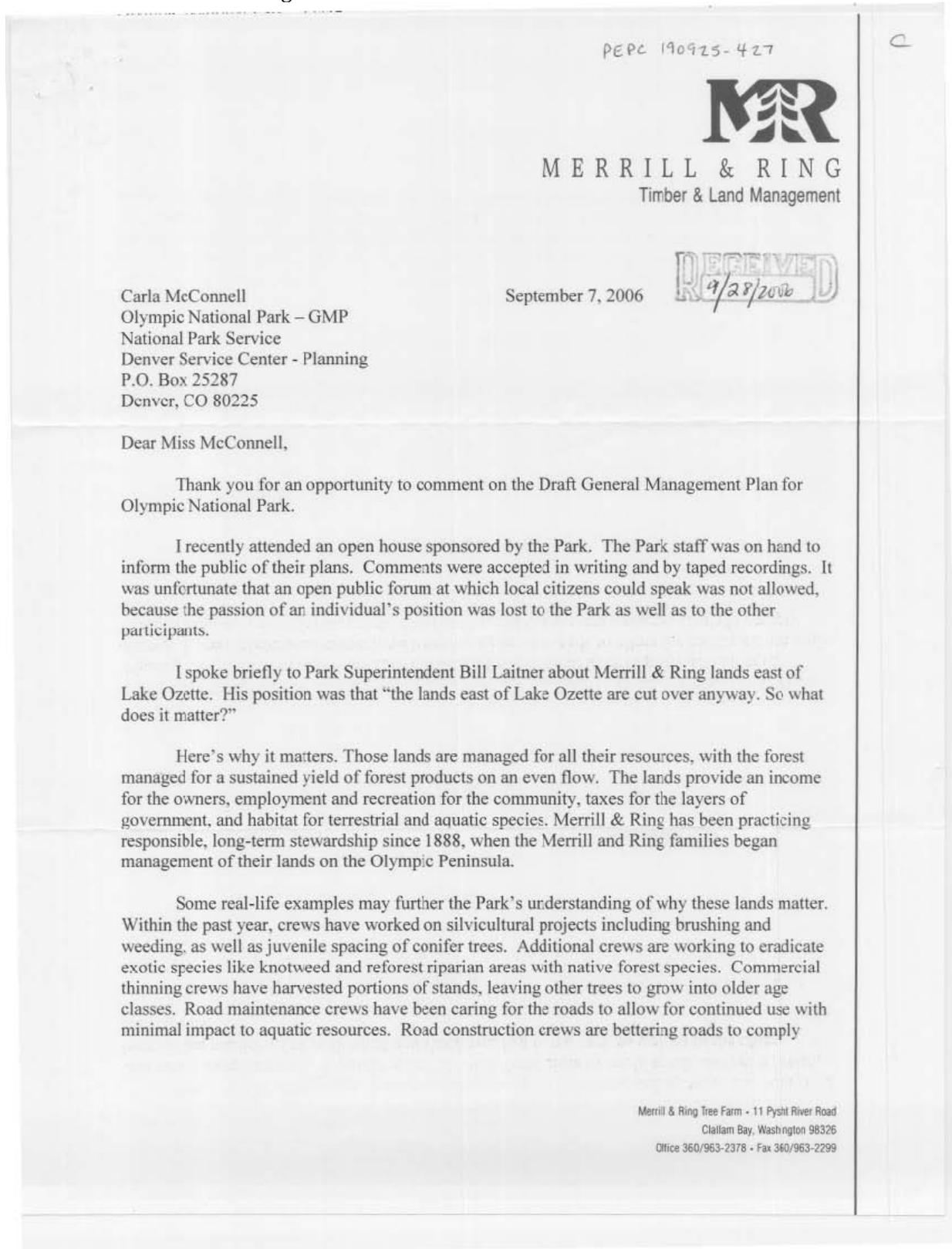
Thank you for the opportunity to review and comment on the Draft General Management Plan for the Olympic National Park. Please feel free to contact me if you have questions about any of these comments or wish to discuss this proposal.

Sincerely,



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

Comment 427-Merrill & Ring

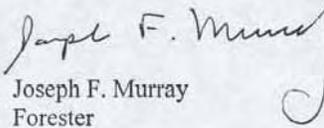


with the new Road Maintenance and Abandonment standards established by Forest Practices regulations. The supplemental bear feeding program employs people who feed the bears in the spring to reduce damage to the forest. All of this work is monitored by foresters and biologists who plan and lay out the various activities, while surveying the streams and forest to insure protection of fish and terrestrial habitat. In addition, there are crews who cultivate and harvest minor forest products.

Merrill & Ring has worked for years with other landowners, tribes, all layers of government and local citizens to develop and implement a recovery plan for the Lake Ozette Sockeye while trying to maintain a viable economic base for the community.

Perhaps these comments will inspire the Park to reassess their beliefs about the commercial forest and develop an understanding of forests where people live and work. The Park provides numerous public presentations, solicits written and taped comments, and goes to great lengths to include this input in publications to document the public process. It is unclear; however, to what extent this solicited input influences Park policies. I would recommend that the Park take a less imperial approach and talk with the people, not at them. We will share with the Park the names and contact information of some of the families whose livelihood will be taken away if the lands east of Lake Ozette are removed from the commercial forest land base. Olympic National Park should develop a plan around 'Alternative A' which allows for the maintenance of existing park lands, roads and developed areas.

Sincerely,

  
Joseph F. Murray  
Forester

Comment 529-Portac, Inc.



**PORTAC, INC.**

BEAVER DIVISION  
A subsidiary of MITSUI and Co. (U.S.A.), Inc.  
Highway 101, MP 211  
P.O. Box 38  
Beaver, WA 98305

PEPC 191159-529

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OCT - 4 2006

DSC-P

Carla Mc Connell  
Olympic National Park - GMP  
National Park Service  
Denver Service Center - Planning  
P.O. Box 25287  
Denver, CO. 80225

September 25<sup>th</sup>, 2006

RE: Olympic National Park Expansion

To whom it may concern,

I believe none of alternatives should be considered until all the facts for each alternative are presented to the public for comment.

Some of the facts that have not been presented to the public are:

1. How much lost tax revenue there will be both to Washington State Department of Revenue for harvest tax and the counties involved due to personal property and payroll taxes due to unemployment. If any of these taxes are reimbursed by the Federal Government there should be an explanation of the exact procedure.
2. No mention of job loss nor payroll revenue loss due to lost harvestable ground base.
3. Why wasn't the Washington State Forest and Fish Law used in the EIS analysis.
4. If Lake Ozette is put into wilderness designation there would be could be no feasible active management to resolve the trash fish conflicting with the Sockeye Salmon.
5. If the boundaries are adjusted prior to acquiring the private land within, it would put an additional hardship on the landowners. The landowners would have to go through a Class V Special Forest Practice Permit to harvest their timber. If the U.S. Park Service never acquires the land this permitting process could last forever.

Until the above facts are presented to the public for comment the Park Service should not proceed with any of the land acquisition alternatives other than alternative A.

The values presented by the Park Service for acquisition and maintenance are not realistic. These costs should be gathered by a disinterested third party.

Currently, the U.S. Park Service does not have enough revenue to maintain the land they are charged with managing, how do they expect to manage a larger land base.

Sincerely,

A handwritten signature in black ink, appearing to read "Russ Westmark". The signature is written in a cursive style with a large initial "R".

Russ Westmark  
Log Buyer

Comment 562-Rayonier



Ms. Carla McConnell  
September 27, 2006  
Page 2 of 4

- **Park control of the expansion area will not enhance aquatic resources when compared to continued private commercial timber management and could have adverse consequences.** The stated reason for expanding the Park boundaries in the Lake Ozette and Queets area is the unfounded assumption that commercial timber harvest will put the fisheries in Lake Ozette and the Queets River at risk, while park management will preserve the fisheries (Plan at 208, 320-21, 370, maps M24, M40). That assumption may once have been true, but has not been true since at least the 2001 adoption of Washington's "Forest and Fish" forest practices rules. See, WAC Chapter 222. The drafters of the Plan and EIS appear to have been completely unaware of the collaborative "Forest and Fish" process between the U.S. Environmental Protection Agency, the National Marine Fisheries Service, the U.S. Fish & Wildlife Service, the Washington Department of Ecology, the Washington Forest Practices Board, affected tribes, and the forest industry. They appear to be unaware of EPA's written assurances that compliance with the Forest and Fish rules will lead to compliance with the Clean Water Act, and the U.S. Fish & Wildlife Service's and NMFS' issuance of incidental take permits under the Endangered Species Act covering forest practices that comply with the Forest & Fish rules. All three agencies have concluded that compliance with the Forest & Fish rules will be protective of threatened or endangered aquatic species and lead to compliance with the Clean Water Act.<sup>1</sup> In light of those facts, it is untenable today to simply assume that Park ownership of the property or taking it out of commercial forestry will provide better protection of the riparian resources than continued commercial forestry.

To the contrary, the lands in question require investment in order to avoid adverse aquatic impacts. The Forest & Fish rules require all major landowners to develop and implement a Road Maintenance and Abandonment Plan (RMAP) for all roads within their ownership. WAC 222-24-050, -052. Rayonier has done so. The Rayonier property within the proposed boundary expansion area contains 46 miles of roads, and the Rayonier property within the exchange area contains 72 miles of roads. If the property remains under Rayonier's commercial management, Rayonier will be responsible for bringing those roads up to current standards for aquatic protection and regularly maintaining them. If they are within the Park, correcting problems with the roads and maintaining them will be the Park's responsibility. Unless the Park can be assured that Congress will appropriate funds to manage these lands on a long-term basis, it may well be the case that taking them out of active commercial management and putting them in

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<sup>1</sup> They say "lead to compliance" because in areas which currently fail to comply with water quality standards because of temperature, compliance may not occur until the riparian forests have grown large enough to provide adequate shade. That will in some instances obviously take some years to occur. But, the trees will not grow faster if within the boundaries of the Park or withdrawn from commercial timber management. Indeed, the Forest & Fish rules permit certain kinds of riparian harvest to replace less desirable deciduous forests with softwood forests and thereby enhance riparian function and accelerate Clean Water Act compliance. Presumably little or none of that riparian restoration will occur if the lands are within the Park boundaries.

Ms. Carla McConnell  
September 27, 2006  
Page 3 of 4

the hands of an entity with too many priorities and not enough resources will result in less protection for aquatic resources, not more.

The Plan also assumes that timber harvesting would risk sedimentation, which would be harmful for aquatic resources. (Plan at 370) Prior to the Forest & Fish Rules there may have been instances in which logging contributed excess sediment to streams, thereby damaging aquatic resources. But, the Forest & Fish rules radically increased the size of riparian management zones, WAC 222-30-021, included protection for forested wetlands and their buffers, WAC 222-30-020(7), took steps to maintain stream bank integrity, WAC 222-30-030, created additional limitations on yarding methods, WAC 222-30-050, -060 and -070, and required expert review of harvests on potentially unstable landforms, WAC 222-16-050(1)(d). The combination of those restrictions should reduce the sediment delivery to streams to close to, if not background levels.

Finally, it is important to note that the Forest & Fish rules include a rigorous adaptive management process, in which the rules will be amended as research determines amendments are necessary or appropriate. WAC 222-12-045. Research is proceeding under CMER at this time to better answer questions for which there was not a scientific answer at the time the Forest & Fish rules were adopted. The federal resource agencies (the EPA, NMFS and the US Fish & Wildlife Service) have regular input into the adaptive management process through TFW. Thus it can be assumed that if research determines that the current rules are inadequate for aquatic resource protection, they will be amended accordingly in the future.

- **Taking 60,000 acres of commercial timberland out of production on the Olympic peninsula will have significant adverse socioeconomic impacts.** The Plan completely ignores the adverse socioeconomic impacts of taking 60,000 acres of land out of commercial timber production on the Olympic peninsula. The Plan and EIS documents the fact that personal income of residents on the Olympic peninsula lags behind that of the rest of Washington State. (Plan at 166) It also documents the region's heavy dependence upon services, government and retail jobs. (Plan at 167). As harvests have been restricted for environmental and aesthetic reasons, communities in once timber-reliant areas have faced a continuing loss of family-wage manufacturing jobs, to be replaced, if at all, by low-wage service and retail jobs. The average wage in the forest industry on the Olympic peninsula is roughly \$30,000 – significantly higher than the average for the region. Taking 60,000 acres of commercial timber land out of production will cost not only the jobs of the people required to manage, plant, thin and harvest that land, but also the mill workers who would have processed those trees into finished lumber. Although other aspects of the Plan may result in additional service and retail jobs being created on the peninsula, there will be no jobs created by expanding the Park boundaries to compensate for the loss of family-wage jobs in the forest products industry. The EIS must recognize that significant adverse impact on the wage base of the Olympic peninsula.

Ms. Carla McConnell  
September 27, 2006  
Page 4 of 4

We want to close with a recommendation for another alternative that is based on fairness. While Rayonier disagrees that taking 60,000 acres of managed commercial forest land out of production and putting it into the Park or a "legacy forest" status will provide any significant environmental benefits, it also understands the political attraction of expanding a National Park. We understand that there are interest groups who view park expansion as an end in itself. Rayonier recognizes that if the plan to expand the Park is not based on science, it may well nonetheless meet approval in the court of public opinion. If Congress decides to expand the Park and appropriates the money to do so, then the Park will be expanded. What would be untenable, however, is to attempt to achieve the goal of taking the land out of commercial production without Congress appropriating the money to acquire the rights it wants for the land's fair market value. Current forest practice rules make commercial management of lands within the boundaries of a national park economically unfeasible. WAC 222-16-050(1)(c). Thus no expansion of the boundaries should occur unless and until the Park Service consults with individual landowners to identify areas of ecological significance worthy of inclusion in the National Park, and Congress appropriates the money to acquire the land for just compensation. No additional constraints should be placed on the land in the park expansion area. Rayonier, like all commercial forest companies in the Northwest, has been asked over the last twenty years to restrict its harvest and the productivity of its land to meet a variety of environmental concerns. But, if the land is wanted for a park, then that is a public use. Land can always be taken for a public use, but when it is, just compensation is required.

Thank you for considering these comments. We would be happy to provide further information as to any of the issues we have discussed.

Sincerely,



Eric Fanelli  
Director, Pacific Forest Resources

cc: The Honorable Norm Dicks  
The Honorable Patty Murray  
The Honorable Maria Cantwell  
The Honorable Senator James Hargrove  
The Honorable Representative Jim Buck  
The Honorable Representative Lynn Kessler

**Comment 440–Rochelle Environmental Forestry Consulting**

PEPC 190938-440

Rochelle Environmental Forestry Consulting  
3127 Hollywood Drive NE  
Olympia, WA 98516-1400

September 23, 2006

National Park Service:

I appreciate the opportunity to comment on the Draft General Management plan and Environmental Impact Statement for Olympic National Park. My comments focus on Alternative D, Olympic National Park's (ONP) preferred alternative, specifically with regard to its proposed actions for expansion of the Ozette and Lake Crescent portions of the Park. These comments were prepared at the request of Green Crow Timber, LLC of Port Angeles, WA, which owns approximately 1,500 acres of forestland in the area of proposed park expansion at Ozette and another 500 acres within the proposed Lake Crescent expansion area. . Also, in the Ozette watershed, Green Crow owns approximately 5,000 acres and manages, for institutional investors, an additional 11,000 acres within the 44,000 acres proposed for purchase and exchange with the State of Washington School Trusts administered by the WA Department of Natural Resources.

The major concern of these private forest land owners and investors is the expansion of the park to include private managed forest lands, ostensibly for the protection of the threatened Lake Ozette Sockeye salmon and its critical habitat, the watershed and water quality of the lake, and the view shed. Also, in the Lake Crescent area, the GMP suggests the proposed expansion near the lake outlet at the head of the Lyre River is necessary to protect the spawning areas for Beardslee and Crecenti trout.

Concerns expressed here regarding alternative D apply to alternatives B and C as well, as they propose expansions encompassing even greater acreages of private forestland.

Under Alternative D, park boundary adjustments in the Ozette unit include expansion to include 12,000 acres of private forest land within the park boundary and the acquisition of an additional 44,000 acres of private forest land outside the park boundary but within the Ozette watershed to exchange for the mineral rights owned by the Washington Department of Natural Resources within the boundaries of ONP. The proposed boundary expansion at Lake Crescent will include an additional 1640 acres of private forestland.

ONP's proposal states that private forest lands within the expanded boundaries would be managed under cooperative private/public land conservancy strategies to protect fisheries habitat, water quality and the view sheds and that private land acquired for exchange with DNR would be purchased from willing sellers.

**Arguments against park expansion to encompass additional area in the Ozette watershed.**

In my view, park expansion for the protection of the threatened Lake Ozette Sockeye salmon and its critical habitat, the watershed and water quality of the lake, and the view shed is not warranted, and in fact will be less effective in achieving these objectives than several programs currently in place. The expansion proposal fails to acknowledge the existence of these initiatives, which include the Washington Forest and Fish Regulations (FFR) which are supported by a Federally-approved Habitat Conservation Plan, and the Lake Ozette Sockeye Salmon Recovery Planning process (LOSRP) being administered by NOAA Fisheries. These initiatives, discussed further below, currently provide both aquatic resource protection (FFR) and will identify and implement restoration and enhancement activities targeted at the factors considered to be limiting Sockeye salmon populations (LOSRP). Both of these initiatives include active processes, in comparison to ONP's proposals which are passive, and as a result will lead to more rapid, focused improvements in habitat conditions for fish and wildlife.

Since these initiatives have not been considered, or even acknowledged in the GMP, the requirement, under park policy, that an expansion of park boundaries requires a determination that other alternatives for management and resource protection have been considered and are not adequate (Appendix B, p.369 ONP-GMP), has not been met.

**The Forest and Fish Regulations**

This set of regulations, focused largely on environmental protection, was developed cooperatively by state and federal agencies, industrial and small-private landowners, and tribes, and sets the rules for conduct of forest practices on state and private forest lands in Washington State. The objectives of the FFR, as defined by the WA State Forest Practice Board, which is made up of a range of stakeholders with key interests in resource management on state and private forestlands, are to:

- Provide compliance with the Endangered Species act for aquatic and riparian-dependent species.
- Restore and maintain riparian habitat to support a harvestable supply of fish
- Meet the requirements of the Federal Clean Water Act for water quality.
- Keep the timber industry economically viable in the state of Washington

Key elements of FFR, which ensure that forest management activities protect aquatic resources, and lead to improved aquatic habitat conditions, include:

- Expanded stream protection rules
- Protection of unstable slopes
- Road maintenance and abandonment planning focused on achieving fish passage and water quality improvements.
- An adaptive management element which will direct changes to the regulations if research and monitoring indicates that the new standards are not being achieved.

Additionally FFR addresses view-shed concerns through its limitations on harvest unit size and requirements for green-up prior to harvest of adjacent units. FFR also contains provisions for voluntary modification of management practices in areas of high public exposure and aesthetic sensitivity.

The regulations are supported by the State of Washington's Habitat Conservation Plan (National Marine Fisheries Service, U.S. Fish and Wildlife Service, 2006), which covers 70 species of native fish and amphibians, and applies to 9.3 million acres of state and private forestland and more than 60,000 miles of streams. The HCP states that Washington State Forest Practice Rules are strong enough to protect fish habitat and water quality in accordance with strict Endangered Species Act (ESA) requirements.

#### **Lake Ozette Sockeye Salmon Recovery plan**

This plan, scheduled for completion in December 2006, is based on a Limiting Factor Analysis (LFA) that identifies and prioritizes factors limiting population recovery (Haggerty 2006). The LFA has hypothesized, but not quantitatively demonstrated, cause and effect relationships between forest management activities and sockeye population declines. In fact, Sockeye and other salmonid populations crashed before substantial timber harvest occurred in the Lake Ozette watershed (Dlugokenski et al. 1981, Jacobs et al. 1996). These hypothesized relationships of forest management to Sockeye declines and lack of population recovery are largely based on past logging and road construction practices which preceded the adoption and continual strengthening of forest practice rules over the past several decades, the latest being the Forest and Fish Regulations and HCP discussed above. Nevertheless, the recovery plan currently under development will address those hypotheses by identifying actions to address concerns regarding detrimental effects of logging and road construction on sockeye habitat and implement restoration or enhancement projects where a specific need is identified.

The LFA identified a number of additional factors as limiting Sockeye recovery in Lake Ozette. Among these are predation on adult and juvenile fish both within the lake and in the Ozette River, lake level changes caused by early settler clearing LWD for navigation on the Ozette River, poor spawning habitat conditions within the lake caused by the lake level changes, and low populations levels resulting from historic over fishing. The likelihood that these factors are of greater importance than forest management in limiting sockeye recovery is supported by observations of the status of fish populations in adjacent watersheds with similar physiographic conditions and logging and road construction histories. An example is the Lake Pleasant Sockeye Population, for which threatened species listing was not considered to be warranted at the time Ozette sockeye were listed. This beach-spawning population is considered to be relatively healthy and stable, or possibly increasing (Personal communication; Chris Northcutt, Quileute Tribe, July 2006). Coho salmon production in streams in the watershed of Lake Pleasant is also high and increasing. Over 85% of the watershed is in state and private ownership and has

many similarities to Ozette with regard to geology and logging history. (WA DNR, Sol Duc Watershed Assessment 1994)

Similarly, the Dickey watershed, a Quillayute river tributary largely in private ownership and managed for forest products, has supported healthy Coho salmon populations on a continuing basis (WA DNR watershed assessment 1998). Significant spawning densities of Coho salmon occur in almost all tributaries of the Dickey, which has similar soils and geology and a logging history comparable to that of the Ozette Basin. This river system was rated healthy by the Washington Department of Fish and Wildlife and considered one of the most productive for Coho salmon in the state (WDFW 1992).

The relatively good condition of the Lake Pleasant sockeye and Dickey River populations, in spite of similar logging practices to the Ozette watershed supports the Ozette LFA conclusion that multiple limiting factors are operating and further suggests the relative importance of forest management as a limiting factor may be overstated.

**Future conditions in the Ozette basin:** Although documentation is not in place to support the contention that forest management is a limiting factor for Lake Ozette Sockeye, several factors are operating to ensure conditions are on an improving trend, making restriction of management activities, as proposed by ONP, unnecessary. As a result of the logging history, most of the roads needed for future management are already in place, significantly reducing the level of future road construction. Logging activity is at a moderate level and will continue to be into the future both as a result of stand age and harvest unit size regulations. Road maintenance planning and upgrading are taking place in the basin, with a focus on water quality and fish habitat improvements. The recent upgrade of Washington Forest Practice rules as a result of FFR established expanded riparian protection requirements as well as restrictions on all operations near water; requirements judged sufficient to meet ESA requirements for protection of fish habitat and water quality. Implementation of the LOSRP is expected to eliminate or reduce the influence of other factors, such as predation and effects of coarse woody debris removal, that are judged to be limiting the Sockeye population. LOSRP implementation is also expected to result in substantial habitat enhancements necessary to quickly reach the goal of harvestable numbers of fish. Since both FFR and LOSRP involve directed, active efforts, they can be expected to support more rapid recovery of this depressed ESU than the passive approach that would occur under ONP jurisdiction.

**Arguments against the Lake Crescent park boundary expansion.**

Available information suggests there is little justification for park expansion in the area of the Lyre River outlet of Lake Crescent. The GMP indicates the purpose of this expansion is for the protection of the spawning areas of the Beardslee rainbow and the Crescent cutthroat trout, both of which are resident in Lake Crescent except during the spawning period when they enter the Lyre River. The spawning area for Beardslee trout is limited to a 400-foot stretch of the Lyre River above the Lyre Bridge, just downstream of the lake outlet. The cutthroat spawning area extends approximately 1 mile downstream of the outlet to the mouth of Boundary Creek. (Goin, 2002).

As they have received little study, life history information for both of these fish stocks, which are endemic to Lake Crescent, is limited. Observations that do exist indicate that spawning counts of both Beardslee and Crescenti trout have declined in recent years. Goin (2002) lists several factors considered to be negatively affecting these fish stocks. These include a loss of spawning area, from logging on Piedmont Creek and from boating and human activity on the long channel in Lake Crescent above the outlet to the Lyre River. These activities apparently result in siltation of spawning gravels downstream of the lake outlet to the river. Goin (2002) also points out that several of the major spawning sites in the Lyre River are associated with logjams, which accumulate gravel, forming spawning areas. These logjams, which are deteriorating and becoming smaller with time, are considered vital for gravel retention and when they are lost, will result in the loss of most Lyre River trout according to Goin (2002). Conversely, Washington Trout, a citizen's group, considered harvesting of Beardslee trout by sport fishermen to be the major cause of their decline (WA Trout, undated). Habitat quality was not considered a problem since the Lake Crescent watershed lies almost entirely within the park, which provides protection from habitat degradation potentially associated with land use activities. In response to the urgings of Washington Trout, ONP has modified fishing regulations in Lake Crescent to protect Beardslee trout.

By virtue of their existence in a protected watershed, and the restricted areas downstream of the outlet of the lake where spawning occurs, it seems unlikely that land use activities, including logging, are threatening these trout stocks. It is not clear to what extent historic land use activities may have influenced habitat, but as outlined above relative to Lake Ozette, forest practices have become increasingly restrictive over the past several decades. The Forest and Fish Rules, discussed above in detail, are considered by federal and state agencies and tribes to be adequate for protection of fish habitat and water quality, and are the standard for forest practices carried out in the private land portions of the proposed expansion area. Of particular significance are the rule requirements associated with road management, with their emphasis on addressing road-related fish habitat and water quality concerns. An additional consideration is that inclusion of this area in ONP is likely to limit efforts to quickly address current problems, such as the loss of the gravel-retaining log jams discussed by Goin (2002). The responses of ONP would likely be passive, and less timely than the active, directed efforts that could occur under current ownership. For these reasons, and because the amount of forest land that could potentially influence the spawning areas is extremely limited, especially given the long period between management entries, park expansion to protect these fisheries from forestry-related habitat degradation is, in my opinion, unwarranted.

**Other resources affected by the ONP proposal.**

Roosevelt elk and black-tailed deer are wildlife species of high interest on the Olympic peninsula both for hunting and for viewing by the local public and visiting tourists. Populations of both of these species are highly influenced by the amount of forage available on a year-round basis (Cook et al 1998). While they occur at low levels within unmanaged forests such as parts of ONP, within the park they tend to be closely associated with natural openings including the alpine zone and areas of natural

disturbance such as riparian areas in the valley bottoms and areas of forest mortality from wind throw and disease. Highest populations occur outside the park, however, where larger-scale disturbances associated with timber harvest have created abundant supplies of forage. The shifting mosaic of interspersed foraging and hiding cover areas resulting from timber harvest create ideal conditions on a continuing basis for these species. The absence of timber harvesting, which is expected under the ONP expansion proposal will result in a landscape dominated for many years by middle-aged forest stands, which, because of the limited amounts of available forage, is the least productive stage of forest development for deer and elk.

**Summary:**

I believe the proposed expansion of ONP in the Ozette basin and Crescent Lake portions of the park to include substantial acreages of private forest land is unlikely to achieve its stated objectives of habitat and water quality improvement. Compared to several active initiatives already in place, activities occurring with park expansion are likely to be passive, and improvements in critical habitat for Lake Ozette Sockeye, the watershed and water quality of the lake are not likely to occur in a timely manner, if at all. The Forest and Fish Regulations are currently implementing federally approved environmental measures designed to protect and improve fish habitat and water quality. Expanded riparian protection and road maintenance and abandonment plans are key activities within FFR directly focused on maintenance and improvement of aquatic resources. At the same time, implementation of the Lake Ozette Sockeye Recovery Plan will target the specific factors determined to be limiting the recovery of salmon, and address those factors through restoration and enhancement efforts. Addressing several of these factors such as predation on adult and juvenile Sockeye and lack of coarse wood in streams will require active directed efforts. Forestry practices, such as thinning in riparian zones can be used to accelerate the development of desired habitat conditions much more rapidly than a passive “let nature take its course” approach. Active efforts of this type are not likely to occur under Park management. Importantly, under the Cooperative Monitoring Evaluation and Research element of FFR, monitoring programs will be in place to assess effectiveness of forest practices as well as recovery plan implementation, and will provide guidance for improvements as needs are observed. Black-tailed deer and Roosevelt elk populations are additional resources of high public interest which benefit from the continuation of forest management in the Ozette area and which will likely decline under park management.

Thank you for the opportunity to comment on the draft General Management Plan and EIS for Olympic National Park. My literature references are listed below. Please feel free to contact me if you require clarification of any of my comments.

Very truly yours,

James A. Rochelle, Ph.D.

**References:**

- Cook, J.G., L.L. Irwin, L.D. Bryant, R.A. Riggs, and J.W. Thomas. 1998. Relations of forest cover and condition of elk: A test of the thermal cover hypothesis in summer and winter. Wildlife Society Monograph 141. 61pp. The Wildlife Society, Bethesda, Maryland.
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- Goin, D. 2002. The Trout of Lake Crescent. Voice of the Wild Olympic 10(3). Olympic Park Associates, Port Angeles, WA.
- Haggerty, M. 2006. Draft Limiting Factor Analysis. Lake Ozette Sockeye Salmon Steering Committee. Port Angeles, WA 342pp & appendices.
- Jacobs, R.G., J. Larson, N. Currence and J. Hinton. 1996. The sockeye salmon *Oncorhynchus nerka* population in Lake Ozette, Washington, USA. Tech. Rep. NPS/CCSOSU/NRTR-96-04, 140p.
- US Department of Commerce, National Marine Fisheries Service and U.S Department of Interior, Fish and Wildlife Service. 2006. Washington State Forest Practices Habitat Conservation Plan.
- Washington Department of Fisheries and Wildlife, and Western Washington Treaty Indian Tribes. 1993. Washington State salmon and steelhead stock inventory. Olympia, WA.
- Washington Department of Natural Resources (DNR). 1995. Sol duc Watershed Analysis. Olympia, WA.
- Washington Department of Natural Resources (DNR). 1998. Dickey River Watershed Analysis. Olympia, WA.
- Washington Trout (undated). Olympic National Park announces fishing rule changes in Lake Crescent. Online report at [http:// www.washingtontrout.org/crescent.shtml](http://www.washingtontrout.org/crescent.shtml).

Comment 426-Seacrest Land Development Corp.

# Olympic National Park Draft General Management Plan

Summer 2006

National Park Service  
U.S. Department of the Interior



190924-426

## COMMENT SHEET ONP - GMP

RECEIVED  
9/28/2006

We welcome your comments on this project. The comment period closes on **09/30/2006**. Your comments must be delivered or postmarked no later than **09/30/2006**.

You may complete this form and provide it to the NPS at one of the open houses, or you may send this form and/or your letter to:

National Park Service  
Denver Service Center - Cliff Hawkes, DSC-P  
12795 West Alameda Parkway  
PO Box 25287  
Denver, CO 80225-9901

It is the practice of the NPS to make comments, including names, home addresses, home phone numbers, and email addresses of respondents, available for public review. Individual respondents may request that we withhold their names and/or home addresses, etc., but if you wish us to consider withholding this information you must state this prominently at the beginning of your comments. In addition, you must present a rationale for withholding this information. This rationale must demonstrate that disclosure would constitute a clearly unwarranted invasion of privacy. Unsupported assertions will not meet this burden. In the absence of exceptional, documentable circumstances, this information will be released. We will always make submissions from organizations or businesses, and from individuals identifying themselves as representatives of or officials of organizations or businesses, available for public inspection in their entirety

### Personal Information

First Name: Morian Middle Initial W  
Last Name: Dickinson  
Organization: Seacrest Land Development Corp.  
Address 1: 1828 O'Brien Rd.  
Address 2:  
City: Port Angeles State/Province WA  
Postal Code: 98362  
E-mail:

Keep my contact information private. Provide justification:

Please use below and the back of the paper for your comments. Attach extra sheets as necessary. Please print or write clearly.

I am responding to your draft Plan as it regards the Kalaloch area. As the former owner of Kalaloch Lodge, I am aware that Kalaloch Lodge must be moved in the near future, due to erosion problems undercutting the present structure.  
(over)

The Seacrest Land Development Corp. would be glad to entertain the possibility of moving the lodge 3½ miles south on ocean front property in order to preserve this historic structure and its continual use, as well as allowing the Park to reduce commercial activity on National Park land, a long stated National Park objective.

Please contact me at: 1828 O'Brien Rd  
Port Angeles, WA 98362 for more information

Sincerely,  
M. W. Davidson  
Seacrest Land Development Corp.  
President

Comment 345-SnoIsle Natural Foods

PEPC 190622-345



"Steven Moore"  
<s.w.moore@worldnet.att.net>

09/26/2006 08:36 AM  
MST

To: <olym\_gmp@nps.gov>  
cc:  
Subject: Olympic National Park Draft General Management Plan/Environmental

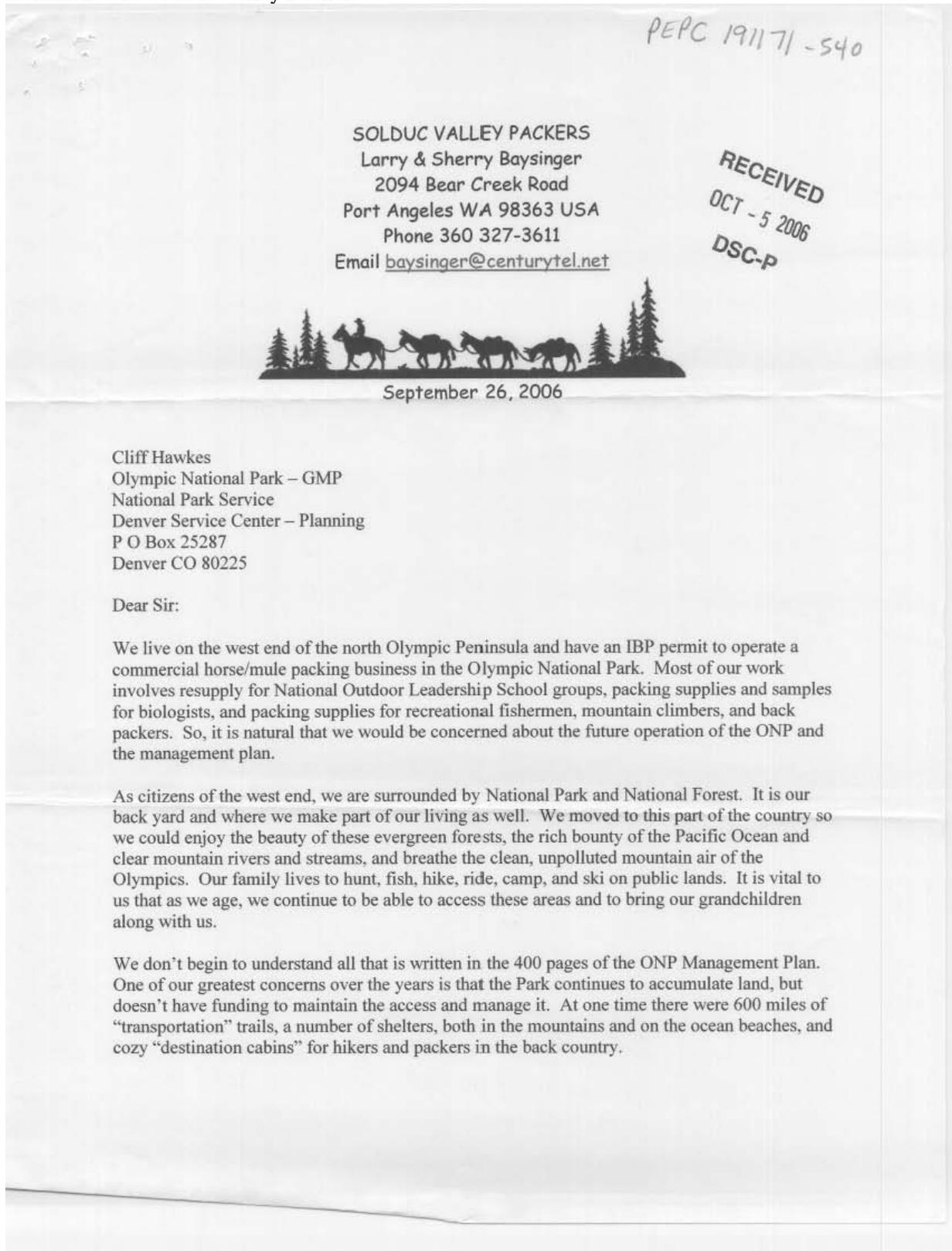
I am a long term park user. You can view my images from this years two week exploration of the coastline at <http://home.att.net/~s.w.moore>

The plan should focus on enhancing the environment of the park for the native species that make the area their home. Develop a unique Wild and Scenic River plan for each of the rivers in the park. Develop no new roads. Reduce the number of motorize vehicles and limit their access. Maintain the existing park infrastructure, but do not invest in new visitor facilities. Increase the funding for wilderness rangers and expand their presence in the park. Acquire as much land adjacent to the park as possible and begin the process of restoring them as natural habitat.

Your most important task is to preserve and enhance the natural environment of the park. So my kids, their kids, and the generations that follow can enjoy it's natural beauty.

Sincerely,  
Steven W. Moore  
Board President  
SnoIsle Natural Foods  
Everett, Wa.

**Comment 540–Solduc Valley Packers**



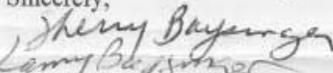
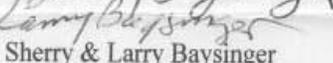
disrepair and only the wealthy and not many family people can afford to stay in the destination resorts that are left at Kalaloch, Quinalt and Lk Crescent Lodge.

Many of the trails cannot be kept open without the use of pack animals to carry the tools, chain saws, etc. Every year we donate hundreds of hours doing skilled labor with our stock maintaining and clearing trails in the National Park and National Forest. There are so few designated stock camps that we often travel 12-15 miles a day to reach a designated stock camp, often cutting our way through the windfalls as we go. We would like to see more designated stock camps in the back country; especially for those who are there to do work. We want the ONP Management plan to include the use of horses on all the trails where stock historically were used.

There are some who believe that only the young and fit have a right to be in the back country. Many of the clients we work for these days are people with disabilities; especially baby boomers (like us), who have been avid hikers/climbers and now have disabilities that keep them from carrying heavy packs. Our pack animals enable these people to achieve their dream of hiking into their beloved mountain camp in spite of their disabilities. We want to see future generations, whether fit, or disabled have this choice. If pack stock are not allowed in certain areas of the Park, if the trails are not kept maintained to stock standards many, many disabled Americans will have no access to the Park.

It is our sincere hope that ONP maintain the trails that have historically supported stock. We hope the new ONP plan will not change trail classifications as a way of permanently closing trails to stock in order to reduce trail infrastructure requirements to a lesser and more financially management level. We hope that the ONP management plan will not exclude businesses such as ours and National Outdoor Leadership School whose operation brings considerable revenue back into the Park.

Sincerely,

  
  
Sherry & Larry Baysinger

Comment 123–The May Valley Company

PEPC 189 431-123



"The May Valley  
Company"  
<kpj@mayvalley.com>  
08/24/2006 06:59 PM  
MST

To: <olym\_gmp@nps.gov>  
cc:  
Subject: Olympic Park and stock use

Please keep the park open to stock use; we at Back Country Horsemen contribute thousand of hours of work on trails each year, both hiking and stock use.

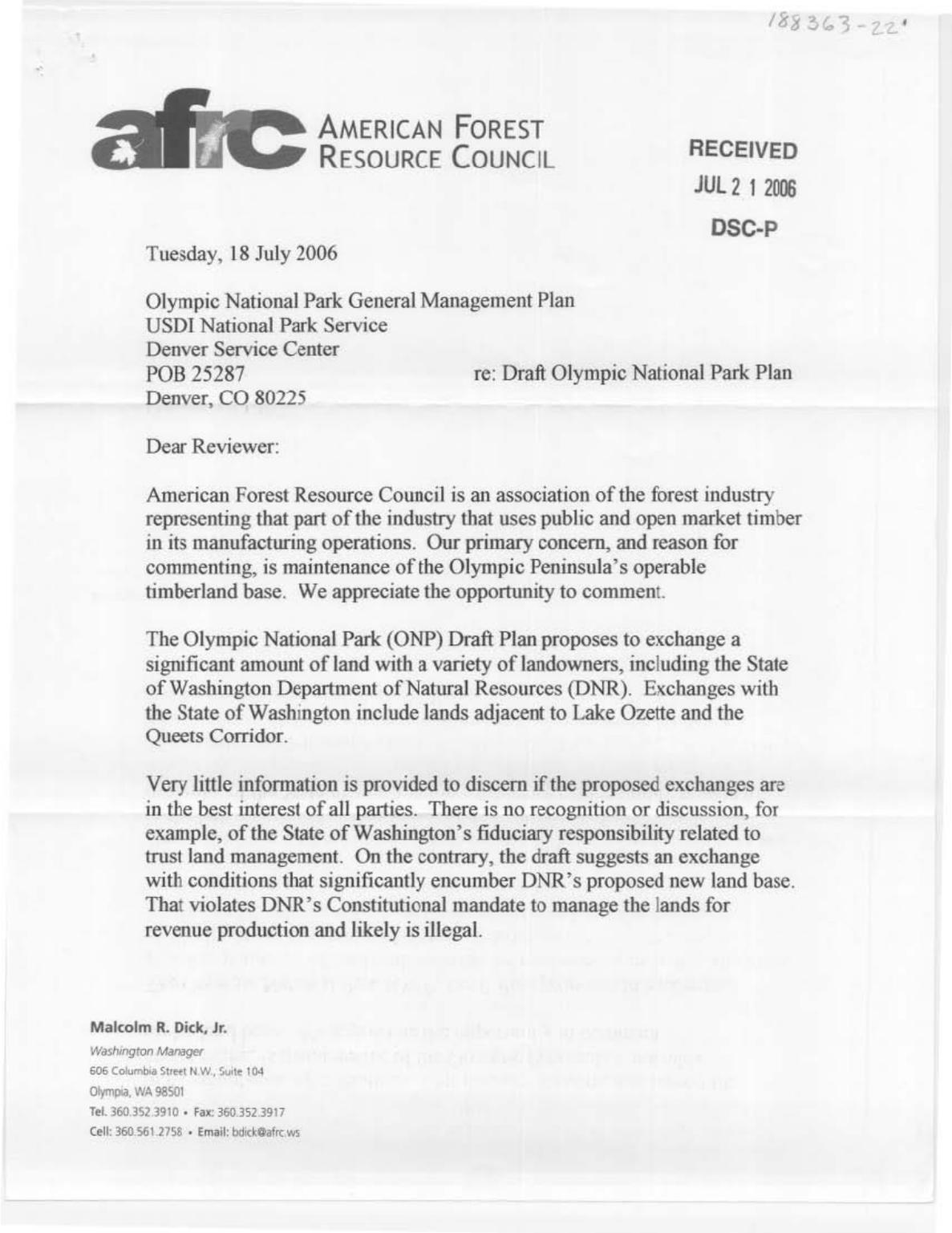
With Forest Service budgets being cut each year, Washington State needs to utilize the knowledge and expertise of our trails crews by keeping trails open.

Our stock can carry heavy materials like gravel for trails and timber for bridges into fragile areas with minimal damage. Maintained trails keep hikers from cutting new trails and damaging the surrounding areas.

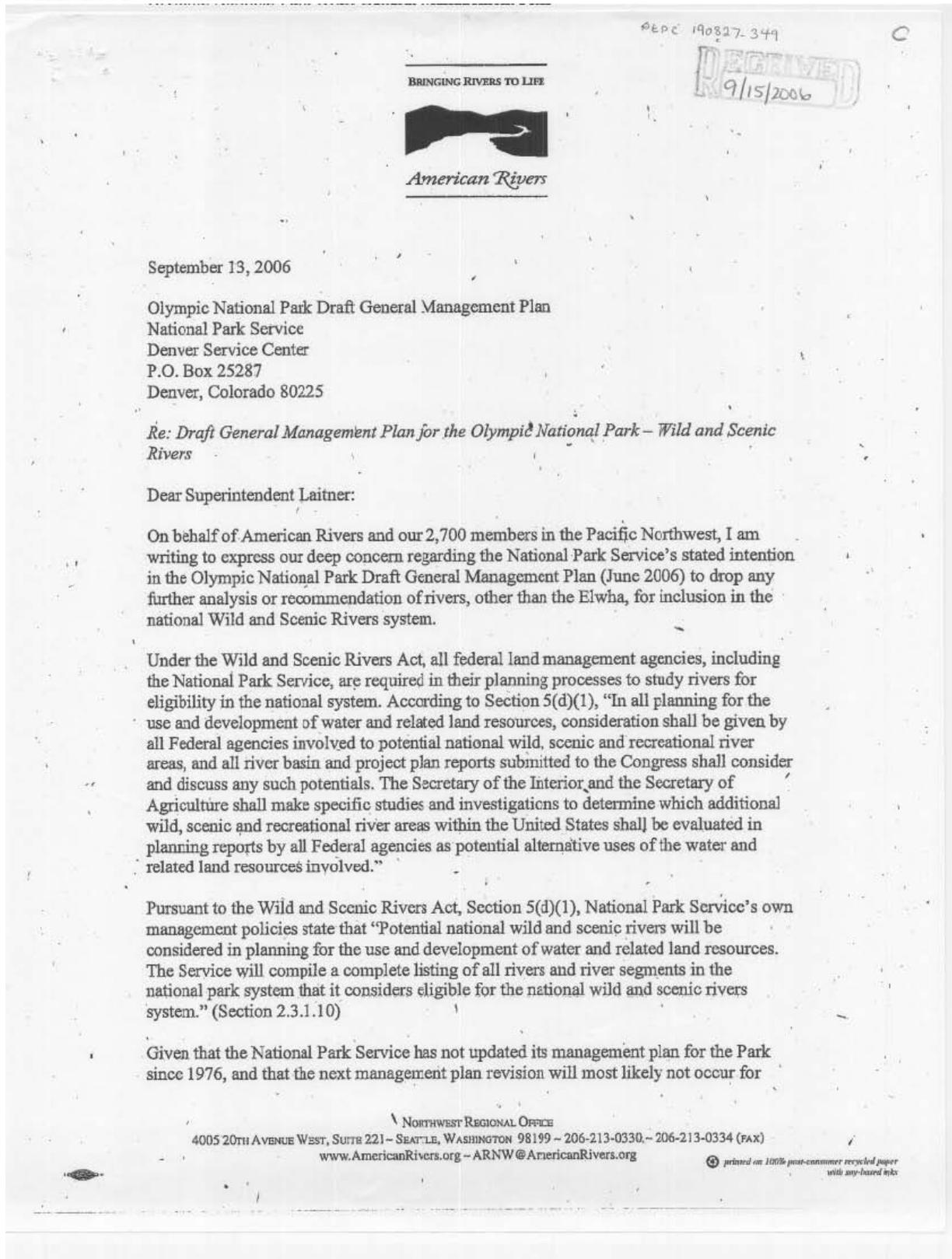
Please include a large number of trails open to stock use and we would very much would like a horse camp; I'm sure you would find the volunteers to build it! Thank you very much, Kathy Jones

Interested Parties

Comment 22–American Forest Resource Council



Comment 349–American Rivers



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*

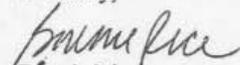
We are also very concerned about several aspects of the Preferred Alternative (D) in the draft management plan, particularly its overall emphasis on visitor access and retaining road access in river corridors, vs. protecting natural river processes and critical fish and wildlife habitat, including spawning 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

Comment 8, 498-American Whitewater

PEPC 191016-8,498



Thomas O'Keefe  
Pacific Northwest Stewardship Director  
3537 NE 87th St.  
Seattle, WA 98115  
okeefe@amwhitewater.org

Electronically submitted olym\_gmp@nps.gov

29 September 2006

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

*Courtesy hard copy*

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OCT - 3 2006

DSC-P

Dear Superintendent Laitner:

American Whitewater appreciates the opportunity to comment on the Draft General Management Plan (hereafter GMP). The staff from Olympic National Park (hereafter Park) and the Denver Service Center have done an excellent job of coordinating public meetings, sharing information with the public, and developing a draft plan that is thoughtfully organized and professionally presented. We appreciate the investment the National Park Service has made in producing a quality document with maps and accompanying text that clearly illustrate alternatives. This recognizes the significant investment members of the public have made throughout the planning process. This plan is important because it represents the first comprehensive planning effort undertaken by the Park since 1976, and the final document will provide guidance and long-term vision for the next 15-20 years.

**Interest of American Whitewater**

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 6,500 members and 100 local-based affiliate clubs, representing approximately 80,000 whitewater paddlers across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. Founding principles of our organization include protection of the wilderness character of waterways and promotion of the recreational value of wilderness rivers.

As a conservation-oriented paddling organization, American Whitewater has an interest in the rivers of the Olympic Peninsula. A significant percentage of American Whitewater members reside in the Pacific Northwest and regularly take advantage of the opportunities for wilderness exploration that the Park offers. While the recreational opportunities are important we place a high value on protecting naturally functioning river ecosystems, including their fish and wildlife, geomorphic processes, and incredible riparian forests where natural successional processes dominate and produce a rich mosaic of vegetation patches. The Olympic Peninsula has been referred to as an "Island of

Rivers,<sup>1</sup> and the Draft GMP refers to water as a “unifying theme” of the Park.<sup>2</sup> The river systems are thus defining landscape features of the Park that are highly valued by our membership and the general public.

Our members regularly take advantage of opportunities to explore the wilderness rivers of the Park. The National Park Service is directed to “provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the superlative natural and cultural resources found in the parks.”<sup>3</sup> The rivers are clearly a superlative natural feature of the Park, which is unique for the diversity of wilderness river opportunities in the conterminous United States. For comparable opportunities one has to travel to Alaska or Canada, and with rainfall totals of more than 15 feet per year, the Park provides an incredible number of river miles in a small geographic area. Exploring the Park’s rivers by hand-powered craft affords visitors with a unique opportunity to experience park resources, promotes enjoyment of the river and riparian landscape, and provides inspirational opportunities to experience wild rivers. Congress enacted the Wilderness Act “to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions ....”<sup>4</sup> The Wilderness Act describes “wilderness” as an area that has “outstanding opportunities for ... a primitive and unconfined type of recreation.”<sup>5</sup>

There are a number of rivers that our membership regularly enjoys in the Park. Unlike nearby rivers in Olympic National Forest the rivers in the Park offer unparalleled and unique opportunities for wilderness exploration. Rivers in the Park provide opportunities for primitive unconfined recreation where individuals have freedom to explore, can practice self sufficiency, and engage in a direct experience with the natural environment. The following are the primary rivers that provide this experience.<sup>6</sup>

- Elwha River: The Elwha is perhaps one of the most visible expert whitewater runs in the Park that attracts visitors from across the country who come to experience wilderness opportunities on the Grand Canyon of the Elwha and Rica Canyon. Intermediate paddlers enjoy the front country paddling opportunities below Glines Canyon Dam on a reach that continues to the park boundary. The headwaters of the river reach into the interior of the Olympic Peninsula and the river cuts a path through the major geologic strata of the Olympics on its path to the sea. Traveling down this river one has a unique opportunity to experience the geologic history of the Olympic Peninsula
- Gray Wolf River: River trips begin in the Park at Three Forks and continue through the Buckhorn Wilderness to Dungeness Forks in Olympic National Forest. The river offers unique opportunities for wilderness exploration.

<sup>1</sup> Beres, N., M. Chandler, and R. Dalton. 1988. *Island of Rivers*. Pacific Northwest National Parks and Forests Association. Seattle.

<sup>2</sup> Olympic National Park, Draft General Management Plan, May 2006, at page 100.

<sup>3</sup> 2006 NPS Management Policies at page 157.

<sup>4</sup> 16 U.S.C. § 1131(a)

<sup>5</sup> 16 U.S.C. § 1131(c)

<sup>6</sup> Descriptions and photos of these rivers can be found on our website at <http://www.americanwhitewater.org> and in the guidebook: Korb, G. 1997. *A Paddler’s Guide to the Olympic Peninsula*.

- Dosewallips River: The Elkhorn Canyon run on the Dosewallips begins at the base of Dosewallips Falls and continues downstream past the Park boundary. This river challenges regional experts who currently hike in past the road washout on Forest Service land to access this run. While the road provides convenient access the river itself provides a wilderness quality experience.
- North Fork Skokomish: The North Fork Skokomish provides opportunities for expert paddlers who hike six miles up the Skokomish Trail and paddle back down to Staircase. The river offers spectacular opportunities for wilderness adventure along sections of the river inaccessible by trail.
- Quinault: The Quinault River offers opportunities for paddling adventures on an intermediate river in the front country areas of the Park. The river is popular for fishing along the reach above Lake Quinault. Hike in wilderness boating opportunities are available upstream of Graves Creek.
- Quinault Gorge: The Quinault Gorge begins at the Pony Bridge and ends at Graves Creek. Expert paddlers hike in to run this wilderness river through a gorge that is inaccessible except at river level.
- North Fork Quinault: The gorge on the North Fork Quinault is well known as one of the most scenic wilderness sections of river in Olympic National Park. Every summer when flows drop to suitable levels, experienced paddlers hike in 12 miles on the North Fork Trail to Geoduck Creek.
- Tshletshy: This creek in the Queets River drainage is accessed by hiking up Big Creek Trail out of the Quinault drainage. This creek offers unique opportunities for wilderness exploration through a remote river canyon that passes through some of the park's most impressive old-growth forest. No trails pass through this remote region of the Park providing a unique opportunity to explore the Park's primeval wilderness areas.
- Sam's: The river is one of the more accessible rivers in the Park because the put-in can be accessed from Forest Road 2180 and the first few miles of river are on National Forest lands. The river ends by skirting the boundary of the Park before joining the Queets at the Queets Campground in the Park.
- Queets: The Queets Trail heads 16 miles up river from the Queets Campground to Pelton Creek. Wilderness paddling opportunities suitable for intermediates are available on this section of river for those willing to hike in and some individuals have explored the section upstream of Pelton Creek. The section from the Queets Campground to Hartzell boat launch provides roadside access in the front country zone and is popular for those who enjoy the fishing opportunities the Queets offers.
- South Fork Hoh: Individuals can hike in on the South Fork Hoh Trail and run a section of river that continues past the Park boundary. This is an easy day trip for paddlers through a short segment of wilderness.
- Hoh: The majority of paddling opportunities on the Hoh begin at the boat launch located just inside the Park boundary. Some individuals have hiked up the Hoh Trail to experience wilderness paddling opportunities available on upstream reaches.

- **Bogachiel:** The Bogachiel offers one of the most spectacular wilderness paddling opportunities on a west side river. Access is available by hiking up over the ridge from the Sol Duc and dropping into the Bogachiel drainage.
- **South Fork Calawah:** Access is available from Rugged Ridge on Forest Service land that provides convenient hike-in access to this river that provides a wilderness boating opportunity suitable for intermediate paddlers.
- **Sol Duc:** This river provides one of the more popular intermediate paddling opportunities in the Park. Paddlers typically begin at Salmon Cascade and can continue out past the Park boundary onto Forest Service land. The fact that this river is in the front country zone makes it accessible as an easy day trip. With the exception of the section just downstream of Salmon Cascade, the road is largely hidden from the river providing a high quality aesthetic experience for those on the water.
- **North Fork Sol Duc:** An easy hike makes this river accessible as a day trip through wilderness for intermediate paddlers that can be enjoyed during the winter rainy season.

Paddlers who have enjoyed the wilderness rivers of the Park for the past several decades have developed a deep appreciation for the unique resources these rivers provide. While some rivers such as the Elwha are well-known classics, the wilderness setting and diversity of rivers allows individuals to find solitude and explore areas of the park where one can find new adventures and rivers to explore. Individuals have a unique opportunity to experience the sense of adventure akin to that of those who explored the Olympic wilderness prior to the creation of the Park. Jason Rackley, a paddler who has written extensively of his explorations in the Olympic wilderness, refers to the Park as one of the “last frontiers” for wilderness river exploration in the Pacific Northwest.

While we are a relatively small segment of backcountry users in the Park we recognize that all visitors have an impact on the environment. River exploration within the Park has similar impacts as hiking, backpacking, and backcountry fishing although use of a trail is one way with the river serving as the return route. We support continued management of backcountry users as outlined in the Draft GMP where hand-powered boating is recognized as a wilderness-compliant activity for all three wilderness zones. Some of the Park’s rivers provide overnight opportunities but the majority of use is for day trips. An important element of our public education efforts focuses on establishing a wilderness ethic for paddlers who explore wilderness rivers. We regularly publish articles in our journal to educate paddlers on safety issues that must be considered on wilderness trips and the importance of practicing Leave No Trace principles including the need to carry rather than drag boats.<sup>7</sup>

#### **Comments on Roads Along Rivers**

We recognize that roads provide important corridors for access into the Park. The

<sup>7</sup> See Bousquin, J. 2005. Minimizing impact on California’s upper Cherry Creek. *American Whitewater Journal* 46(3):50-53; and feature edition on *Wilderness Paddling*, *American Whitewater Journal* 46(5).

problem is many of these roads pass through sensitive riparian areas and disrupt natural river function and processes. While the access that roads provide is important to recreational users including the constituency we represent, the impacts they have when they pass through channel migration zones can severely disrupt both ecological processes and aesthetic qualities of the river. Over the past 5 years we have seen new retaining walls, rip rap, and fill along the Quinault, Queets, Hoh, and Sol Duc. These highly engineered solutions distract from the very qualities that make these river such an incredible resource in a region where very few miles of undisturbed wild rivers remain. Convenient roadside access is available along several miles of river in Olympic National Forest and what makes the Park unique is the opportunity to have a wilderness river experience. Rivers in the Park should be managed to provide this experience.

While relocation of wilderness boundaries is a sensitive topic for discussion we believe it is appropriate to explore this option as a common-sense alternative to moving roads outside of the channel migration zone and onto more stable glacial terraces. This would only be acceptable under the condition that there would be no net loss of total wilderness. In some cases it may make sense to decommission roads and we support critical evaluation of this alternative, but in other cases where a public need for access is documented we would like to see alternate access routes outside the channel migration zone explored as an alternative. An excellent example where this alternative could be implemented is along the Queets River where a parallel road on National Forest lands could provide alternative access (see site specific comments below). Where feasible, moving roads out of channel migration zones, could provide a more stable road network that can be maintained and that will have reduced ongoing resource impacts such as we currently observe on rivers like the Hoh.

Alternative B offers an intriguing possibility for management of river floodplains along major west side rivers including the Hoh, Queets, and Quinault by establishing a “River Zone”. We are supportive of this concept and believe it should be implemented along at least one of these rivers. Recent research, much of it conducted within the Park over the past decade, has significantly advanced our understanding of natural river function and process and the importance of floodplain connectivity.<sup>8</sup> Historically we only considered the wetted channel when implementing management actions along river corridors. We now have a much great understanding of the dynamics of large floodplain rivers and the importance of these dynamics for river function,<sup>9</sup> There are few rivers in the entire country where one can observe the natural processes that operate on these west side rivers. The Park has a responsibility to update current management practices to reflect our current scientific understanding of the importance of dynamic rivers for overall ecosystem health. In addition these rivers serve as critical natural laboratories that provide the knowledge informing management and restoration of rivers throughout the

<sup>8</sup> See Van Pelt, R., T.C. O’Keefe, J.J. Latterell, R.J. Naiman. 2006. Riparian forest stand development along the Queets River in Olympic National Park, Washington. *Ecol. Mongr.* 76(2):277-298; and Latterell, J.J., J.S. Bechtold, T.C. O’Keefe, R. Van Pelt, and R.J. Naiman. 2006. Dynamic patch mosaics and channel movement in an unconfined river valley of the Olympic Mountains. *Fresh. Biol.* 51(3):523-544.

<sup>9</sup> See O’Connor, J.E., M.A. Jones, T.L. Haluska. 2006. Flood plain and channel dynamics of the Quinault and Queets Rivers, Washington, USA. *Geomorphology* 51:31-59.

Pacific Northwest's temperate rainforest.<sup>10</sup>

### **Comments on Wild and Scenic Rivers**

A preliminary analysis has determined that 13 rivers or river segments are eligible for designation as part of the Wild and Scenic Rivers system. These rivers include the Bogachiel River, Ozette River, Calawah River, Queets River, Dosewallips River, Quinault River, Duckabush River, Royal Creek, Elwha River, Skokomish River, Gray Wolf River, Sol Duc River, and Hoh River. An eligibility report has been completed for the Elwha River with the section from the mouth to Mills Reservoir found eligible following removal of Elwha and Glines Canyon Dams, and the section from Mills Reservoir to the headwaters eligible under current conditions. While an eligibility study has been completed for the Elwha, the Draft GMP states that "no formal eligibility studies have been conducted for the remaining eligible rivers... Further studies of eligibility will be conducted after completion of this general management plan, so this topic is dropped from further environmental analysis."<sup>11</sup>

We are disappointed that the Draft GMP proposes to drop further analysis or recommendation of rivers, other than the Elwha, for inclusion in our nation's Wild and Scenic Rivers system. Many of the rivers identified clearly represent the nation's most appropriate candidates for Wild and Scenic designation, and an eligibility determination is necessary to complement planning efforts on Olympic National Forest. Given the importance of the Park's rivers to the public and their status as defining features of the Park, eligibility of Wild and Scenic Rivers should be one of the Park's highest priorities.

### **Wilderness**

While our primary focus is on rivers we have a strong interest in their watersheds including the wilderness qualities of the landscape. A wilderness management plan for the Park needs to be completed. In general we find that the Park places an overemphasis on historic preservation and not enough emphasis on natural resource preservation and restoration. For example the Park has focused recent efforts on replacing historic structures while ignoring the need to restore extirpated species such as wolves that have been successfully reintroduced in Yellowstone National Park and other places across the West. We believe the focus of Wilderness management should be on the restoration and preservation of the Park's ecosystems. Historical structures can be documented through narratives and photographs.

### **Visitor Services**

Decisions on visitor services should recognize the fact that the Park is largely a wilderness area. The fact that there are no major cross-park roads that penetrate the

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<sup>10</sup> See Naiman, R.J., H. Décamps, M.E. McClain. 2005. *Riparia: Ecology, Conservation, and Management of Streamside Communities*. Elsevier. Boston; and Mapes, L.V. 2005. A river reigns through it: in a unique living lab, the web of life is revealed. Pacific Northwest, *The Seattle Times Magazine*, January 30, 2005.

<sup>11</sup> Olympic National Park, Draft General Management Plan, May 2006, at page 51.

interior of the Park is unique among the major National Parks of the West. New or expanded interpretation and education facilities should be developed outside the park for the benefit of local communities and the integrity of park resources.

#### **Site Specific Comments and Recommendations**

In addition to our general comments above we provide the following site specific recommendations corresponding to major river systems where we have an interest in future management.

##### **Elwha**

For almost two decades American Whitewater has been a stakeholder in the effort to remove Elwha and Glines Canyon dams. Removing these dams would restore one of the signature rivers of the Olympic Peninsula. We note that the Preferred Alternative states that “additional camping and hiking trails would be considered within the Elwha drainage (former Lake Mills).”<sup>12</sup> While we are supportive of fully capitalizing on opportunities to highlight educational activities associated with this dam removal that will have national significance, we urge caution and support limitations on the level of infrastructure development so the public has an opportunity to see but not disrupt ecosystem recovery. For the short term we do not believe new camping areas are appropriate on lands exposed by draining the reservoir.

##### **Quinault**

The south park boundary upstream of Lake Quinault should be adjusted to include the full channel migration zone of the Quinault River. Adjusting the current park boundary would improve the ability to more effectively manage and protect elk populations that utilize the river floodplain. We believe a boundary adjustment along this river should be a long-term goal as parcels become available. The Finley Creek bridge should be removed or replaced with a more suitable solution. We support further exploration of alternatives to relocate roads outside of channel migration zones.

##### **Queets River**

Currently there are parallel road networks within the Park and on National Forest lands. The Queets Road within the Park follows the river through the channel migration zone and across terraces composed of fine-grained sediments that are slumping into the channel. At the Matheny Creek river crossing the bridge is undersized and fill is replaced on a regular basis in an attempt to preserve this crossing. In contrast the Forest Road 21 and 2180 spur are paved, cross Matheny Creek along a section of the river that is bedrock controlled rather than alluvial, are well outside sensitive riparian areas, and pass within a mile of the Queets Road where a gated connector road could provide a potential alternative route into the Queets Campground and boat launch. The Park should seriously explore an alternative of decommissioning the Queets Road upstream of Hartzell boat launch and providing alternate access to the campground and boat launch through a partnership with the Forest Service utilizing Forest Road 21 and 2180.

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<sup>12</sup> Olympic National Park, Draft General Management Plan, May 2006, at page M12.

The Queets river offers the most significant opportunities for designation of a River Zone as outlined in Alternative B and we believe this alternative should be fully explored. We support the boundary adjustment on the north side of the river near Lyman Rapids as well as public and private partnerships to assist in comprehensive watershed protection efforts.

#### Hoh

We support exploration of alternatives to move the Hoh River Road out of the channel migration zone and potentially relocate visitor facilities. We believe there are significant opportunities for new interpretive facilities outside the river floodplain and this should be the long-term vision. Boundary adjustments to bring the confluence of the South Fork Hoh within the Park should be explored. As part of any effort to pursue this, public hike-in access to the confluence area from the south side should be considered.

For many park visitors the Hoh is the gateway, and for some their only introduction, to the west side rivers and old-growth forests that line their banks. Because of this there are important public outreach opportunities. The Draft GMP notes that "outdated exhibits do not adequately present the key interpretive themes as they relate to the rainforest environment."<sup>13</sup> We believe that there are significant opportunities to more effectively communicate the attributes of natural river systems. Interpretive trails at the Hoh River visitor center focus on mature forests but provide limited information on the river or the network of wall base channels and wetlands representing the past legacy of channel migration. For many visitors this may be their only opportunity to see a large floodplain river that is allowed to migrate across its floodplain and this is an important educational opportunity.

#### Sol Duc River

The preferred Alternative D retains seasonal road access that could be adjusted depending on weather. We wish to see access to Salmon Cascade through the first weekend in December. In some years the road is closed before any snow covers the first 7 mile segment of road up to Salmon Cascade. Through the period of fall and winter rains the Sol Duc River provides some of the best opportunities for a day trip on the water, and the river is well known as one with simple logistics. Closing the gate before snow covers the road significantly complicates logistics.

Opportunities to move the road out of the channel migration zone, particularly in the area downstream of Salmon Cascade, should be explored. Highly engineered solutions to place the road along the side of the river have had a negative impact on the scenic qualities of this river.

#### Conclusion

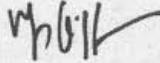
Thank you for the opportunity to comment on the Draft GMP. We request that we remain on the mailing list for any future updates or opportunities for public input. We have

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<sup>13</sup> Olympic National Park, Draft General Management Plan, May 2006, at page 147.

greatly valued our relationship with Park staff. Please do not hesitate to contact us if you have any questions regarding public use of rivers in the Park.

Sincerely,



Thomas O'Keefe  
Pacific Northwest Stewardship Director

cc:

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