

Comment 565-Backcountry Horsemen of Washington



**BUCKHORN RANGE CHAPTER**  
**BACKCOUNTRY HORSEMEN OF WASHINGTON**  
P.O. Box 845, Chimacum, WA 98325

PEPC 191202-565

RECEIVED  
OCT - 4 2006  
DSC-P

Cliff Hawkes  
Olympic National Park - GMP  
National Park Service  
Denver Service Center - Planning  
P.O. Box 25287  
Denver, CO 80225

September 17, 2006

RE: General Management Plan - Ability to Adjust Trail Zone Boundaries

When considering the designation of trail zones, it is important that some flexibility exists to adjust zone boundaries due to the need to relocate existing trail locations. It is our experience that natural events, such as those that result from the impacts of snow and water (mud slides, river course changes, erosion), earthquakes, rock fall, and other changes, can cause impacts on existing trails that are prohibitive to repair without relocating trail routes to different more stable areas. There are also failures of man made structures (bridges, puncheons, etc) where the cost effective alternative is to relocate a trail to an area which does not require structures.

The General Management Plan needs to provide for flexibility whereas trail zones can be adjusted or moved through a process which maintains existing uses without a net increase in detrimental environmental impacts.

Additionally, there will occur impacts to trails which may make stock use impassable until repairs can be completed. With funding shortages, the timeframe for repairs may be measured in years rather than in months. The ONP should refrain from changing trail classifications as a way of permanently closing trails to stock in order to reduce trail and trail infrastructure requirements to a lesser and more financially maintainable level. Obstacles and hazards may close a trail to stock - but only until such time that the obstacles can be removed, the hazards can be addressed, and the trail can be restored.

Sincerely,

JEFF CHAPMAN  
Jeff Chapman,  
Director, Buckhorn Range Chapter BCHW

Comment 566-Backcountry Horsemen of Washington



*PEPC 191204 - 566*  
**BUCKHORN RANGE CHAPTER**  
**BACKCOUNTRY HORSEMEN OF WASHINGTON**  
P.O. Box 845, Chimacum, WA 98325

**RECEIVED**  
**OCT - 4 2006**  
**DSC-P**

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

September 16, 2006

RE: Dosewallips Access and Use

The primary arterial into the Olympic National Park from the east side for pack stock is via the Dosewallips drainage. The maintenance and supply access point has been in the past near the upper Muscott Flats Dosewallips campground. At one time, there was a horse camp down the road from the main campground - which was near the river. This site is mostly destroyed now due to the river changing course.

Due to the road washout in the Olympic National Forest, the Dosewallips campground has been cut off to motorized traffic, and use of the campsites has been dramatically reduced. As it is, this campground has a large enough area to accommodate both hike-in traffic and stock use. Some stock items (hitching posts) have been added to address the need for stock facilities.

When the road was still open to motorized vehicles, recreational users pulling horse trailers would either brave the hill past the falls, or park below at Elkhorn Campground or across 10 mile bridge. If parking below, you could then ride up the road over Constance Creek, though traffic made this trip less pleasant for recreational riders than it has been while vehicular traffic is cut off.

Planning for use in the Dosewallips drainage must deliberately address continued stock access. Even ONP maintenance crews pack tools and supplies in using this route. Should restoration of motorized access to Muscott Flats occur, ONP needs to continue to provide a suitable place for a stock camp near the road end.

In addition to continued maintenance of the existing road, we also support any effort to establish an additional off-road corridor trail, including the possibility of a non-motorized route south of the river which would run between 10 mile bridge in the Olympic National Forest and the upper campground.

Sincerely,

*JEFF CHAPMAN*  
Jeff Chapman,  
Director, Buckhorn Range Chapter BCHW

Comment 584-Backcountry Horsemen of Washington

PEPC 191225-584

**Olympic National Park**  
**Draft General Management Plan**  
 Summer 2006

National Park Service  
 U.S. Department of the Interior



**COMMENT SHEET ONP - GMP**

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

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 DSC-P

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: *Lori* Middle Initial: *A*

Last Name: *Lennox*

Organization: *Backcountry Horsemen of WA, Grays Harbor Chapter Director*

Address 1: *82 O'Neill Rd.*

Address 2:

City: *Elma* State/Province: *WA*

Postal Code: *98541*

E-mail: *llennox@centurytel.net*

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.

*Dear NPS,*  
*Please keep stock trails in the ONP open to AT LEAST the current miles. More if possible! The more miles there are the safer the trails, the less traffic, congestion, conflict there will be as folks can disperse themselves.*

*As Americans "grey" (Bummers) more & more are finding that they can get around a lot easier on horses & mules than they on aging knees & joints. Please don't shut down access to these people.*

*Lori*

And the more stock trails there are, the easier it is to maintain a large majority of all trails as pack stock can be used to provide manpower & supplies.

As a resident of Grays Harbor on the Olympic Peninsula, I can see the population growing by leaps & bounds. Many come for the recreation opportunities. Please consider facilities & trails for the increasing numbers of people wanting to use the awesome, beautiful Olympic National Park on horses & mules.

Thank you.

Lori Sennoy

Comment 533-Backcountry Horsemen of Washington



PEPC 191164 - 533

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OCT - 2 2006

DSC-P

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

September 26, 2006

RE: Comments on Draft General Management Plan/EIS for the Olympic National Park

The Backcountry Horsemen of Washington is an organization comprised of recreational and pack stock users throughout the State of Washington who are dedicated to preserving our historical use of horses and mules on public lands. We do this not just as users, but as working volunteers who every day of the year can be found on our public trails packing tools, supplies, and crews; building puncheons, bridges, and turnpikes; repairing trails with Pulaskis, McLeods, and shovels; and cutting out brush and logs. There isn't a federal forest or national park in Washington State that hasn't had members of our volunteer organization investing time and labor into keeping their trails open for the citizens of our nation to enjoy.

Stock use on the Olympic National Park (ONP) dates back to a time before the park was conceived. Horses and mules were historically the means by which supplies and pioneers moved around the inland areas of Washington State. Trails were laid out through the Olympic Mountains for stock to pass on. Even the famous Press Expedition used saddle and pack stock to cross through the Olympics. Park Service and Forest Service holding facilities were built around the Olympic Peninsula to accommodate the horses and mules used by federal employees to steward the federal lands in the area, much of which came under Wilderness designation after Congress passed the Wilderness Act of 1964. Stock use continued after that time, and even today, the Olympic National Park maintains a federally funded pack string to perform trail maintenance throughout the ONP.

Development of the General Management Plan for the Olympic National Park is being done under the guidelines of the 1969 National Environmental Protection Act (NEPA) as well as Director's Order 12 of the National Park Service which specify a range of alternatives utilizing the NEPA process. NEPA is guided by several principles stated in the act including "3. Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences." and "4. Preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice." (Title 1, Sec 101(b)). It is these principles, among others, which should guide the development of policies in the General Management Plan under NEPA.

Clearly, recognition of the role horses and mules have played in our state's history is a testament to the historic, cultural, and beneficial roles of stock to our society, particularly in the transporting of people and goods on public roads and trails, including those in the Olympic National Park. Our organization's successes are a testament that stock users educated with fundamental respect and appreciation for the well being of our environment, augmented by Leave No Trace principles, can effectively share trails with other users without causing any meaningful or even noticeable degradation of environmental elements. Due to the rugged nature of the Olympic National Park as well as limited access points from populated areas, stock use in the park is consistently low use - well below any volume levels that would cause undo stress from overuse. In return for providing trails for stock use, trails are much more likely to receive needed maintenance since tools, gravel, supplies, and people can be brought in using horses and mules. Ecosystem recovery time from low elevation grazing is relatively short due to the wet conditions in the Olympic Mountain area. In fact, many areas have had stock traffic for many decades, and yet in the spring, there is barely a sign that a horse has ever passed through.

There is no reason to limit stock use below existing levels. NEPA concerns are well satisfied under existing use patterns. The only real issue is that trail standards for stock use require more maintenance and infrastructure than hiker only traffic. This may be true, but the benefit of using stock for packing offsets to a large degree this issue. We do understand that due to environmental changes such as slides and flooding rivers, trails can suffer damage that may make them unsafe for load bearing horses and mules. Temporary closures to stock until repairs can be made may be necessary. However, we do not



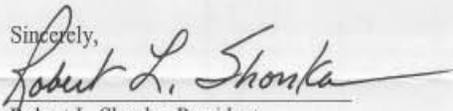
support any efforts to permanently lower maintenance expectations by zoning away access rights to stock as a quick fix to financial woes where federally funded budgets consistently fall short of maintenance backlogs.

The General Management Plan proposes the establishment of Management Zones. For the most part, stock is prohibited in most of the zones with the exception of some of the trail zones and trailheads. Zoning is fundamentally a governmental tool to set boundaries for regulatory limitations. In the ONP wilderness, the bulk of the land area is to be placed in Primeval and Primitive Zones, both excluding stock. This does not appear to be a big issue currently since these areas are virtually void of trails and are not used by stock at present. However, zoning horses out means there never will be the opportunity for horses to utilize these areas should trails be built or circumstances change, which leaves the only backcountry access open to stock a prescribed subset of trails in the Wilderness Trail Zone.

Our requests are then:

- That any trails open to stock currently remain open to stock.
- That any horse camping areas currently open to stock remain open to stock, including those above 3,500 feet.
- That there be a zone adjustment system that will allow trails and/or roads to be relocated due to unstable conditions or natural events that necessitate relocation of trails and/or roads to more stable locations.
- That any existing structures used for stock camping, tie-ups, addressing trail hazards, or provided at parking areas, including the parking areas themselves, be kept available and open to repair and maintenance either by ONP staff or by volunteers.
- That the weed free certified feed requirement be implemented and enforced based on best management practices, availability of certified feed, and education of users.
- That Wilderness should be managed with a balance between preservation and public access under the principles set forth in the Wilderness act. Stock use on Wilderness trails, where appropriate, should remain open to all stock users, not just to special permitted Park Service approved pack strings or saddle horses.

It is well documented that our nation has been leaving the outdoors and moving into less physically active sports for their recreational pastimes. There are less backpackers on the trails, less hikers, and less horse riders than in prior generations. Our citizens are experiencing increased obesity, more health problems, and increased anxiety. The solution is to get them outdoors; get them back in touch with the magnificence of nature. But they can't get to the outdoors if land managers promulgate programs and management plans that continually keep the door closed. Keep the Wilderness open to visitors who come by foot – or by pack and saddle stock.

Sincerely,  
  
Robert L. Shonka, President  
Backcountry Horsemen of Washington  
110 W. 6<sup>th</sup> Avenue, PMB 393  
Ellensburg, WA 98926  
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Comment 470-Bellingham Bares

PEPC 190977 - 470

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Correspondence Information

**Status:** New **Park Correspondence Log:** 190977  
**Date Sent:** 09/30/2006 **Date Received:** 09/30/2006  
**Number of Signatures:** 1 **Form Letter:** No  
**Contains Request(s):** No **Type:** Web Form  
**Notes:**

Correspondence Text

Hello! I'm writing in regard to the proposed changes to the Olympic Hot Springs area of the park. My friends and I often travel to Olympic National Park (a distance of well over a hundred miles) specifically for the hot springs. We prefer being clothing optional in nature; it feels natural, it's low impact, as we respect the resources and are concerned stewards of any area we enjoy (not only for all the usual reasons, but also for practicality, it's hard to enjoy being bare outdoors if you have to beware of broken bottles, etc!). We're concerned that rehabilitation means removal, which would be terrible as these are some of the most beautiful hot springs I've been to! We don't believe any of the four proposed alternative(A,B,C,D) management plans adequately addresses Olympic Hot Springs.

Please consider the following points:

- 1) Keep soaking at Olympic, but reduce the number of pools at the site to three or four, located near the main source. This would keep flow-through high, maintaining cleanliness. It would help rehabilitate the runoff area, reduce the impact of use and enhance the environmental integrity.
- 2) Contract the mainenance of the resource to an experienced caretaker. This is very effective with other hot springs in the pacific NW, such as Goldmeyer Hot Springs.
- 3) Change the road (Olympic Hot Springs RD) to a trail beyond the Altair site.

Please consider that rehabilitation does not require that the resource be made unusable for those of us seeking more remote recreational experiences (without the hot springs, I wouldn't be making the trip to the park, as sharing space with rv families is not a natural experience for me). Other details of the NPS preferred plan, (D), accomodate traditional use, and the traditional clothing optional use at Olympic Hot Springs should be retained. Thanks! Roman Stadler

Comment 552-Clallam Bay Sekiu Advisory Council

PEPC 191188 -552

## Clallam Bay Sekiu Advisory Council

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

September 25, 2006

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OCT - 4 2006  
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Dear Miss McConnell,

Thank you for an opportunity to comment on the Draft General Management Plan for Olympic National Park.

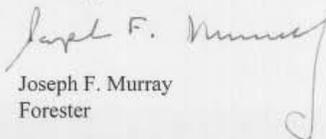
I recently attended an open house sponsored by the Park. The Park staff was on hand to inform the public of their plans. Comments were accepted in writing and by taped recordings. It was unfortunate that an open public forum at which local citizens could speak was not allowed, because the passion of an individual's position was lost to the Park as well as to the other participants.

"However, the four county region is not affected due to the size and diversity of the regional economy." This conclusion is stated in the section "Local Economies" under the part of the document titled "Impacts to the Socioeconomic Environment." This seems to show the Park's lack of understanding of our local economies. The local economy in the Clallam Bay/Sekiu area and other parts of the Western Olympic Peninsula, essentially the economy on the West End is driven by natural resources and tourism. The East side of Olympic National Park has larger more diversified economies in the urban areas. Most of commercial forest land that would become part of the Park is on the west side of the Peninsula, this will cost direct job loss to those employed in the forest as well as in the communities supported by the forest. Your preferred 'Alternative D' will cost our community jobs which are essential to our socioeconomic environment.

Reducing motorize boating would reduce local and tourist use of the Ozette Lake and corresponding economic activity. This is yet another example where the Park has overlooked the interests and economic well being of our West End communities.

Perhaps these comments will inspire the Park to reassess their beliefs about the West End and develop an understanding of the people who live and work in the area. 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. We would recommend that the Park take a less imperial approach and talk with the people, not at them. Olympic National Park should develop a plan around 'Alternative A' which allows for the maintenance of existing park lands, roads and developed areas. This will provide a balance between the concerns of local citizens and the Olympic National Park as part of our community.

Sincerely,

  
Joseph F. Murray  
Forester

Comment 281–Clallam Bay/Seki Chamber of Commerce



Comment 462-Clallam Economic Development Committee

PEPC 190960-462

**Name:** Linda L. Rotmark  
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**Organization Type:** I - Unaffiliated Individual  
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Correspondence Information

<b>Status:</b> Reviewed	<b>Park Correspondence Log:</b> 190960
<b>Date Sent:</b> 09/29/2006	<b>Date Received:</b> 09/29/2006
<b>Number of Signatures:</b> 1	<b>Form Letter:</b> No
<b>Contains Request(s):</b> No	<b>Type:</b> Web Form
<b>Notes:</b>	

Correspondence Text

The Clallam networks Economic Development Board represents the voices of public and private (business) members including representation from the cities of Forks, Sequim, Port Angeles, Clallam County, the Port of Port Angeles, Public Utility District #1 and Olympic Medical Center. At their August 18, 2006 meeting it was resolved to participate in the public comment section of the report. At the September 19, 2006 Board Meeting, Bill Laitner and his associate presented the plan to the Board for their better understanding of the components. The following are bullets representing the Board's position:

We understand and acknowledge the important role that the ONP plays within the region's tourism sector as the most significant draw for visitors to the region.

We also accept the fact that the role of the ONP is multifaceted in its efforts to provide protection to the unique resources and wildlife of the ONP while also ensuring a quality recreational experience for all visitors to the park.

We believe that maintenance of existing infrastructure and improving visitor access must be a higher funding and implementation priority than expanding the ONP boundaries.

We believe that the main focus during the ONP general management planning period should be improving visitor access and their experience in the park by augmenting existing infrastructure with additional bike paths, trails, expanding the use where feasible of mass transit, completion of the Spruce Railroad Trail, expansion of the lodging seasons, development of new campground and visitor facilities. Many visitors come expecting modern facilities capable of adequately serving the existing visitor population, however, many of the ONP's facilities are out dated, overwhelmed and in need of a significant investment in renovation, expansion and modernization. In addition, unless some overwhelming demonstrative and objective analysis indicates a real and present danger to specific unique resources, we are not supportive of the removal of existing visitor points of access to the ONP, or the removal of existing camping sites within ONP.

We believe that there must be continued emphasis on fully funding and expanding the park's interpretive programs, while maintaining and improving its current information centers. Visitors are coming to the ONP for a variety of reasons and we expect each visitor to have the opportunity to learn not only about the natural history of the ONP, but also the cultural and historical significance of the region as well. One of the "unique resources" of ONP that we are adamant about the NPS having a duty to protect and increase the population of within the ONP is the interpretative rangers and the backcountry rangers.

We applaud the effort of the NPS to ensure adequate security is in place within the ONP, however, we believe that the NPS is presuming that a security ranger can also serve as a "stand-in" interpretive and visitor information ranger which is not the case.

We believe that there may be opportunities for the NPS to develop and strengthen working ties with the surrounding communities in addressing the issues of access roads to ONP in unstable areas.

We do not advocate for the removal of those access points, but rather believe that working in cooperation and good faith with the local community stakeholders where such roadways exist would be in the best interest of the community, the region and the ONP.

With regard to land acquisition, we are not supportive of efforts to expand the park at the expense of the livelihood of others in the community. Any acquisition must be the result of fair, good faith, and honest transactions not involving direct or indirect pressures by the federal government to 'encourage' parties to become "willing sellers." Emphasis on land acquisition should be placed on those land owners who approach the NPS seeking to sell their property due to hardship or those land owners that may be surrounded by the NPS and no longer wanting to own their property.

Finally, we applaud the NPS for specifically noting that the ONP staff must be more actively engaged in the communities in and about its borders. However, if this proposal is adopted in the final plan, ONP should be willing to implement it sooner than later and should focus its involvement in ways that increases the community's understanding of ONP activities while aiding in the marketing of the region to the visiting public.

Comment 327-Conservation Northwest



190804-327

Officers  
 Board President Alexandra Loeb  
 Board Vice-President Bill Donnelly  
 Board Secretary Jeffrey J. Bodé  
 Board Treasurer Tom Campion  
 Executive Director Mitch Friedman

3414 1/2 Fremont Ave. N  
Seattle, WA 98103

September 22, 2006

Carla McConnell  
Olympic National park GMP  
NPS Denver Service Center -- Planning  
P.O. Box 25287  
Denver, CO 80225

Re: Olympic National Park General Management Plan DEIS

Dear Ms. McConnell,

CNW appreciates this opportunity to comment on Olympic's Draft General Management Plan (GMP). We agree with much of Olympic Park Associates' (OPA) recommendations, and submit these comments in the hope that they will lead to a sound plan and a positive future for this significant, world-renowned natural preserve.

Conservation Northwest (CNW) is a regional conservation organization representing 5,000 members that are dedicated to the preservation of wilderness, old-growth forests, roadless areas, and other regions important to the conservation of Washington's fish and wildlife. We have a long history of promoting conservation on the National Forests and Parks of Washington State, and other public lands. Many of our members use this area for recreation, and we have great interest in assuring that the park will be managed in a way that will preserve its pristine qualities and unique environment.

Our goal for Olympic National Park over the next 20 years is a fully restored ecosystem with its original components, processes and habitat functions intact. Use would be managed to insure visitor enjoyment of the park with the primary focus of protecting the health of its ecosystems throughout the future. We agree, given the park's legal mandates and agency policies, that this should be your goal as well.

Significant changes have taken place since the last management plan in 1976. Roads, logging, and residential development of forestlands now characterize much of the park boundary. Increased recreational use of all types places demands on resources. Cumulative impacts on lower rivers and salmon streams and illegal hunting pressures have harmed park wildlife, fragmented habitats, and impaired ecosystem functions. Visitation to the park has increased dramatically, doubling since 1976.

For a general management plan to deal with these kinds of threats to the future ecological integrity of the park, it must be bold, visionary, and encompass a broad view of Olympic's role in maintaining the larger Olympic ecosystem. Your 1976 master plan provided this kind of guidance for most of the past few decades, but we feel the preferred alternative in the current draft falls short of those goals.

We appreciate and support those recommendations in the preferred alternative (D) that move the plan in this direction. Particularly, we support the following:

- The establishment of intertidal reserves – this issue has been exhaustively discussed by the Olympic Coast National Marine Sanctuary advisory committee. Recommending establishment of the reserves is a bold step, and one to which we hope you will remain committed.

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*Board President*      Alexandra Loeb  
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*Board Secretary*      Jeffrey J. Bodé  
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*Executive Director*      Mitch Friedman

- The park's intent to recommend boundary expansions to protect habitats for threatened and at-risk wildlife populations.
- A wilderness study for Ozette Lake, Pyramid Peak ridge, and future additions. Ozette is the last coastal wilderness lake outside Alaska and richly deserves protection.
- Wild and scenic river designation for the Elwha, but we fear the significant expansion of the development zone in the valley works against watershed restoration.
- The relocation of the highway and other use facilities within coastal erosion and flood plain zones, which will decrease risks to the public.
- The park's intent to expand educational and interpretive programs, develop short interpretive trails, and encourage mass-transit in high-use areas.

All of these recommendations are a strong start toward a GMP worthy of a World Heritage Site and international biosphere reserve.

In general, however, we find the preferred alternative of the draft GMP to be lacking in the critical qualities mentioned above: boldness, foresight, and sense of the park's place in the larger Olympic ecosystem. The draft is timid in its approach to resource protection, and many of its protective measures are compromised and inadequate to protect park resources into the future. We feel that much of what alternative (B) proposes would provide for a more sound ecological approach to preserving the significant ecosystems that remain within Olympic's boundaries. The lack thereof in the preferred alternative drives several concerns.

Specifically, alternative (D):

- Denies "river protection zone" status to the park's rivers, many of which provide critical habitat for a number of federally listed threatened and endangered salmon stocks. In particular, rebuilding washed-out roads with rock armoring destroys salmon habitat and compounds impacts on fish. The proposed Dosewallips road reconstruction, for example, will harm critical spawning areas for federally threatened Puget Sound Chinook. If the intertidal reserves can be applied, why not include river zones specified in alternative (B) to aid in safeguarding salmon throughout their full spawning cycle. Merely protecting them through the estuary zone is not sufficient.
- Maintains all road access throughout the park, including floodplains, regardless of impacts to salmon habitat and natural river processes. Recommends moving wilderness boundaries on active floodplains to maintain poorly located roads. In particular, continued bulldozing of Finley Creek channel in the Quinault area will continue in the plan, impacting salmon and other wildlife habitats simply to provide year-round access.
- Transforms zoning designation from wilderness into use levels without supporting reference or justification. Wilderness related issues should be guided by a wilderness management plan that considers proposed uses according to their wilderness impact, directed under the Wilderness Act.
- Has proposed boundary expansions that are inadequate to protect down-stream fish species from destructive upstream activities like timber harvest and road building. For example, Ozette Lake sockeye and Puget Sound chinook, listed under the ESA, are at risk as well as spawning areas for the unique Beardslee and Crescenti trout. Park elk populations are also experiencing hunting impacts due to nearby roads.

Web and email  
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Officers  
 Board President: Alexandria Lueb  
 Board Vice-President: Bill Donnelly  
 Board Secretary: Jeffrey J. Bodé  
 Board Treasurer: Tom Campion  
 Executive Director: Mitch Friedman

In particular, we find a lack of support for the substantial development expansion. Even though visitor trends are continuing upward, a correlation likely exists with increases in population growth. We cannot continue to supply a limited resource to an increasing demand. At some point visitation will be maximized, and while our limited knowledge of ecosystem connectivity constricts how much of the park we can make available, we have the ability to control visitation if necessary. We ask you to take heed for the future of the park and be cautious as you advance.

We also note that alternative (D), as described on page 68, "...includes slightly more development zone acreage in the frontcountry when compared with alternative (B), and slightly less than alternative (C)." When comparing (B), (C) and (D) in the subsequent maps, the preferred alternative reveals development and use proposals nearly, if not identical to those in (C) in 9 of the 13 frontcountry zones, with significantly more development than (B). "Slightly" more or less is clearly an understatement. Accommodating visitor use, as a priority, should not be a focal goal that overrides wilderness protection. If use expansion persists, as outlined in the preferred, the very wilderness we are protecting will continue to shrink. While we appreciate accommodating all types of users, CNW would like to reiterate the growing concern that current population growth has already placed significant pressures on wildlife regimes around the world. What remains in our extraordinary park is rare and vital to its continued, intact existence.

Furthermore, increases in visitor use and road construction throughout the park over forthcoming years will exacerbate current hydrologic problems. Considerable research on the impacts of forest roads advises decommissioning problematic sections (see Redwood National Park for guidance). Many of the valley floors within ONP are flood plains that already encounter geomorphic changes, including network extension and increased peak flow, due to road construction in higher elevations. We would like to reaffirm what hydrologic research suggests and ask you to include considerations for decommissioning where washout problems persist.

Finally, we feel the draft plan lacks the opportunity to address a number of larger issues that would insure sound ecosystem management in the face of an uncertain future. We ask park planners to reconsider these recommendations, many of which are outlined in OPA's 2001 scoping letter, for inclusion in the final GMP.

- An ecosystem study from which to base critical resource management decisions,
- a recommendation to reintroduce wolves and the fisher into the Olympic National Park,
- a plan to address and eradicate invasive and non-native species, not just discuss their occurrence within the park,
- provide wild and scenic river recommendations for at least 12 park rivers that qualify for congressional designation, and
- a wilderness management plan that will address numerous controversial decisions regarding wilderness management in light of requirements of the Wilderness Act.

While the DEIS presents substantial discussion of the necessary balance between natural preservation and human use, we find that the dialogue does not actually support an equilibrium. Significant use expansion proposals and focus on cultural concerns consistently override natural resource protection in several arenas. Our national park, one worldly considered a biosphere reserve, should put forth its greatest efforts to protect the very nature of its existence. As we all know, it is much easier to be cautious than to attempt to revert to original conditions. Therefore, it is imperative that we collaborate to provide this region with the utmost respect and defense, especially as external forces continue to pressure its few-remaining, pristine qualities.

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[www.conservationnw.org](http://www.conservationnw.org)  
[info@conservationnw.org](mailto:info@conservationnw.org)

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 phone 360.671.9950  
 fax 360.671.8429

Seattle office  
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 Seattle, WA 98103  
 phone 206.675.9747  
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 35 West Main #220  
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 fax 509.747.1267

Republic office  
 PO Box 150  
 Republic, WA 99166  
 phone 509.775.2667  
 fax 509.775.3454



Board President Alexandra Loeb  
Board Vice-President Bill Donnelly  
Board Secretary Jeffrey J. Bodé  
Board Treasurer Tom Campion  
Executive Director Mitch Friedman

We provide the aforementioned suggestions and concerns in hopes that wildlife and wilderness protection will continue to be the chief goal for Olympic National Park. CNW would like to see a final GMP with clear guidance, that is well balanced and reasonable, and provides these spectacular ecosystems with the protections necessary to insure a healthy environment; one which will endure the challenges of the coming decades.

Sincerely,

Alisyn Maggiora, Forestry Coalition  
Derek Churchill, M.S. Forestry

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[www.conservationnw.org](http://www.conservationnw.org)  
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Republic office  
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Republic, WA 99166  
phone 509.775.2667  
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Comment 255-Evergreen Packgoat Club

PEPC 190683 ✓ -255

**Olympic National Park**  
**Draft General Management Plan**  
 Summer 2006

National Park Service  
 U.S. Department of the Interior



COMMENT SHEET ONP - GMP

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 25267  
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: James Bennett Middle Initial F.  
 Last Name:  
 Organization: Evergreen Packgoat Club, North American Packgoat association  
 Address 1: 14717 Purdy Dr. N. W.  
 Address 2:  
 City: Gig Harbor State/Province Wa  
 Postal Code: 98332  
 E-mail: WethersFieldPackgoats@Comcast.NET  
 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.

although I think my comments are more appropriate for the wilderness management plan. I would like to propose to the ONP the opening of the ONP packstock trails to packgoat use.  
Our organization includes people who have used horses and/or llamas for packstock what people find with goats is that they are friendlier, they carry up to 30% of their body weight, and are very low impact on trails. In addition to recreational packing, goats have been used by the U.S. Forest Service, Bureau of Land Management and State Wildlife and Fish agencies where access is very difficult or where resource damage by traditional packstock is a concern. It is highly likely that the National Park Service Policy

190683 pg 2

will be listing goats as acceptable packstock, for backcountry use.

The main point is that packgoats are very low impact animals compared to other packstock such as other stock like horses or mules that are already allowed in the Park.

Goats used as packstock are predominately wethers (neutered males) and does. Bucks (intact males) do not pack, can not and will not pack, no one packs with bucks thus making it impossible to create any kind of feral population. Many of us have been packing with goats in the Olympic National Forest for years. If there was a problem with feral populations arising from the use of packgoats the OMP would have seen some sign by now. There is no such problem.

Also contrary to most beliefs most goats don't stink only bucks do, and since no one packs with bucks, there is no problem with goats drawing in predators etc. wethers and does actually have less of an odor than do horses or llamas.

Thank you for your time and ~~and~~ consideration.

Jim Bennett

Evergreen Packgoat Club

Comment 25-Forks Chamber of Commerce

FORKS

25- PEPC 188464 PEPC ✓

Olympic National Park  
Draft General Management Plan

Summer 2006

National Park Service  
U.S. Department of the Interior



COMMENT SHEET ONP - GMP

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12795 West Alameda Parkway  
PO Box 25287  
Denver, CO 80225-9901

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Last Name: BINGHAM L  
Organization: FORKS CHAMBER OF COMMERCE  
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Address 2: 612 STEELHEAD AV  
City: FORKS WA State/ Province  
Postal Code: 98331  
E-mail: chamber@forks.wa.com

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.

"Boundary adjustment is a clear euphemism for land acquisition. Whether by condemnation or sale, I am opposed to GMP requiring any more land waters & united current lands can be inventoried, secured, and where appropriate, made available to more of the public. Good features and wilderness values are in the minority; this must be the park is inaccessible and I am opposed to this.

**Comment 315–Friends of Miller Peninsula State Park**

190792 -315

September 19, 2006  
Olympic National Park Draft GMP  
Denver Service Center  
P.O. Box 25287  
Denver, CO 80225  
[olym\\_gmp@nps.gov](mailto:olym_gmp@nps.gov)

**RECEIVED**

**OCT - 4 2006**

**DSC-P**

To: Park Planners

Friends of Miller Peninsula State Park was established in the early 1990s to protect the natural ecosystem of 3000 acres of State Park undeveloped lands near Sequim, Washington. Our goal is to promote the preservation of wild lands within the State Park system as much as is possible within the State's planning process.

We applaud the National Park plan to responsibly manage Olympic lands for future decades, but am uncomfortable that the planning alternatives are presented without the completion of a comprehensive wilderness plan. Several controversial issues are difficult to respond to without a wilderness management plan.

Recent discussion of restoration of extirpated species has been encouraging. We would like to see Park planners emphasize efforts to restore carnivores, like the fisher, and eventually the wolf. Such efforts would be very positive in an effort to rejuvenate the integrity of the Park's natural ecosystem.

Salmon are perhaps the most essential element of any restoration project. For this reason, we urge the park to recommend eligible rivers for Wild and Scenic river designation. This would strengthen Alternative B – specifically, by adding river protection zones.

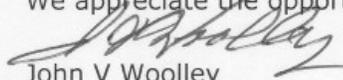
Expanding the Park boundaries is critical. Park planner recommended actions should include complete watersheds, as much as possible, within the five areas: Ozette Lake, Lake Crescent, and the Queets, Quinault, and Hoh river systems.

Please do not expand developed areas or developed zones. All proposed recreational and private developments should not be located on Park lands. They should be outside the National Park.

We applaud the Park Service for recommending wilderness study for Ozette Lake, and for progressive idea of establishing Olympic Coast intertidal reserves.

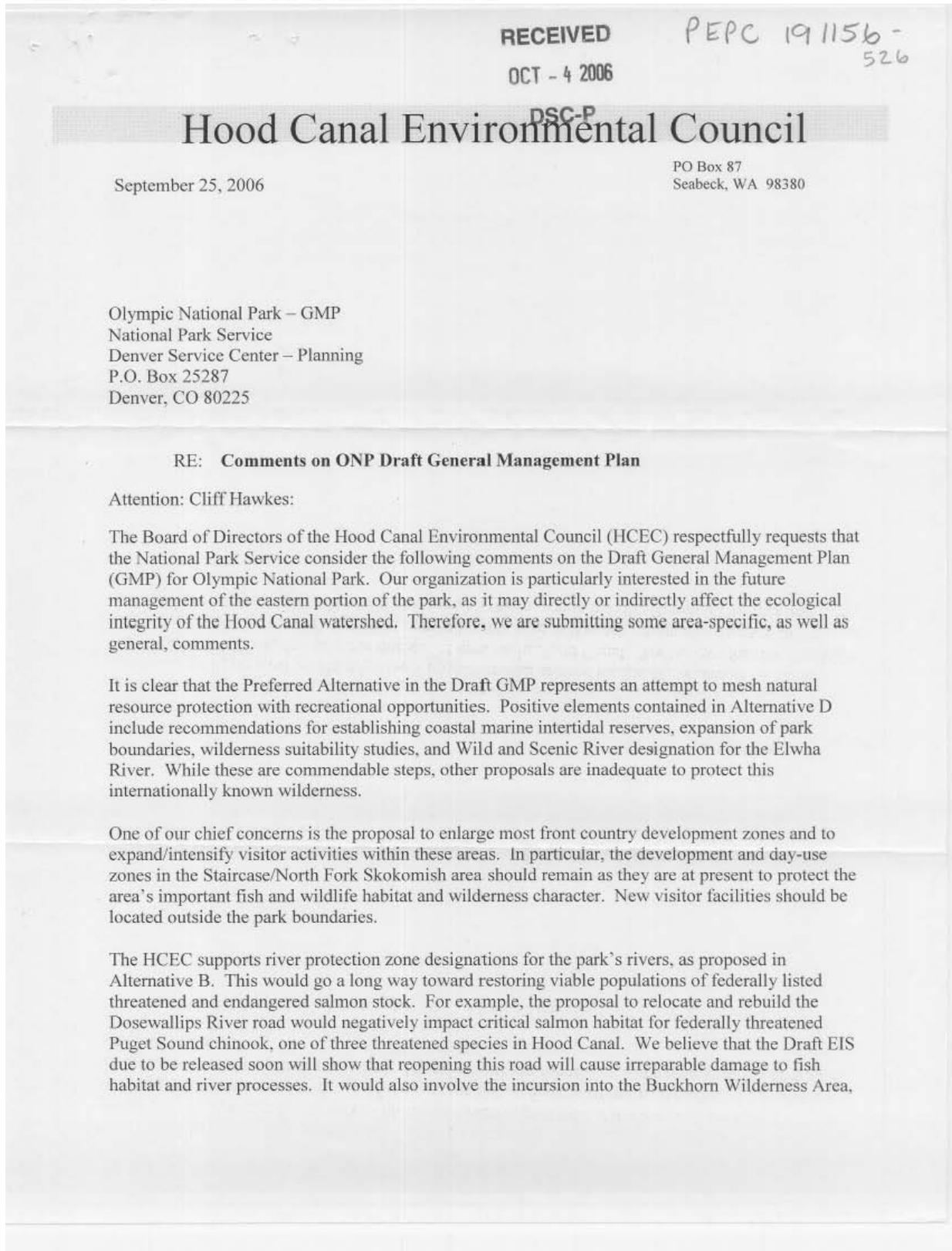
The Olympic is a world heritage Park. Alternative D falls short in recognizing this, because of its focus on motorized use and development. More emphasis should be on preserving ecological integrity. The GMP draft is a good start.

We appreciate the opportunity to comment.



John V Woolley  
Friends of Miller Peninsula State Park  
1606 E Sequim Bay Rd  
Sequim, WA 98382

**Comment 526–Hood Canal Environmental Council**



RECEIVED

PEPC 191156 - 526

OCT - 4 2006

**Hood Canal Environmental Council**

DSC-P

September 25, 2006

PO Box 87  
Seabeck, WA 98380

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

**RE: Comments on ONP Draft General Management Plan**

Attention: Cliff Hawkes:

The Board of Directors of the Hood Canal Environmental Council (HCEC) respectfully requests that the National Park Service consider the following comments on the Draft General Management Plan (GMP) for Olympic National Park. Our organization is particularly interested in the future management of the eastern portion of the park, as it may directly or indirectly affect the ecological integrity of the Hood Canal watershed. Therefore, we are submitting some area-specific, as well as general, comments.

It is clear that the Preferred Alternative in the Draft GMP represents an attempt to mesh natural resource protection with recreational opportunities. Positive elements contained in Alternative D include recommendations for establishing coastal marine intertidal reserves, expansion of park boundaries, wilderness suitability studies, and Wild and Scenic River designation for the Elwha River. While these are commendable steps, other proposals are inadequate to protect this internationally known wilderness.

One of our chief concerns is the proposal to enlarge most front country development zones and to expand/intensify visitor activities within these areas. In particular, the development and day-use zones in the Staircase/North Fork Skokomish area should remain as they are at present to protect the area's important fish and wildlife habitat and wilderness character. New visitor facilities should be located outside the park boundaries.

The HCEC supports river protection zone designations for the park's rivers, as proposed in Alternative B. This would go a long way toward restoring viable populations of federally listed threatened and endangered salmon stock. For example, the proposal to relocate and rebuild the Dosewallips River road would negatively impact critical salmon habitat for federally threatened Puget Sound chinook, one of three threatened species in Hood Canal. We believe that the Draft EIS due to be released soon will show that reopening this road will cause irreparable damage to fish habitat and river processes. It would also involve the incursion into the Buckhorn Wilderness Area,

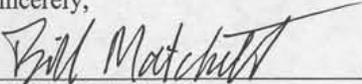
in direct violation of the Northwest Forest Plan. In addition to river protection zone designations, we fully support Wild and Scenic river designation for the other twelve eligible rivers, including those on the park's eastside.

We strongly object to the proposal to designate use levels of wilderness areas without providing specific reasons. All wilderness-related decisions should be deferred until a comprehensive wilderness management plan is completed.

The Draft is also notable for its omissions. One is the absence of a recommendation to reintroduce extirpated species back into the park. We strongly urge the National Park Service to include a proposal to bring the wolf and fisher back into the Olympic National Park in an effort to bring about a more balanced ecosystem. We request that a wilderness management plan and ecosystem study be prepared, as requested by the Olympic Park Associates and other organizations.

We appreciate the opportunity to comment on this very important matter and to participate in the decision-making process.

Sincerely,



---

Bill Matchett, President  
Hood Canal Environmental Council

**Comment 503–Howard County Bird Club**

PEPC 191021-503

**HOWARD COUNTY BIRD CLUB**

9045 Dunloggin Court  
Ellicott City, Maryland 21042  
[krschwal@comcast.net](mailto:krschwal@comcast.net)

September 29, 2006

Olympic National Park General Management Plan  
NPS, Denver Service Center  
PO Box 25287  
Denver, CO 80225  
[olym\\_gmp@nps.gov](mailto:olym_gmp@nps.gov)

To the National Park Service:

The Howard County Bird Club appreciates the opportunity to submit the following comments on the draft General Management Plan for Olympic National Park. Members of the Howard County Bird Club have visited Olympic, as it contains important habitat for birds and other forms of wildlife.

The value of Olympic National Park to the nation is never clearer than at the park boundary, where the devastated, clearcut lands outside the park remind us what would have happened to the whole Olympic landscape, had the park not been established. Our members have witnessed this devastation outside the park. Hence, we believe that protection and restoration of the lands within the park should be the highest priority in this General Management Plan.

The Howard County Bird Club is an organization with a membership of more than 200 families and individuals in Howard County, Maryland. We are a chapter of the Maryland Ornithological Society, a nonprofit, statewide organization of people who are interested in birds and nature. Our purposes include promoting the study and enjoyment of birds, promoting knowledge about our natural resources, and fostering their appreciation and conservation. We offer field trips, bird counts, and conservation projects. The club has raised and donated over \$50,000 for wildlife habitat preservation during the past 25 years. Our members travel all over the United States to visit national parks and other federal lands on birding and nature-watching vacations. We spend dollars on food, lodging, guide services, books, and souvenirs to support the local economy wherever we go. Birding is one of the fastest-growing outdoor sports.

**Wildlife Values**

Olympic National Park is well known for its great diversity of wildlife habitats, from Pacific coastal waters to high mountain peaks. Over 300 species of birds and 70 species of mammals have been recorded in the park, including 18 endemics. UNESCO has designated the park as an International Biosphere Reserve and as a World Heritage Site. The American Bird Conservancy has identified Olympic National Park as a Globally Important Bird Area, and Peter W. Thayer lists it as one of the top 100 North American birding hot spots.

To make the most of wildlife values in Olympic, we urge the National Park Service to emphasize the restoration and protection of the natural ecosystem of the Olympics. This

park may be the best opportunity in the lower 48 states to have a complete, intact ecosystem functioning naturally. The preferred alternative (Alternative D) misses several opportunities to restore and protect the ecosystem, as we will point out below. We favor the reintroduction of the fisher and wolf in Olympic and more vigorous efforts to restore the degraded rivers.

#### **Development Zones**

We support the measure in Alternative D to introduce voluntary public transportation in congested traffic areas of Olympic park. Comparable systems of shuttle buses or snow coaches are in use at Yosemite (3 locations: Yosemite Valley, Wawona, and Tuolumne Meadows), Yellowstone, Grand Canyon south rim (4 routes), Zion, Bryce Canyon, and Harpers Ferry. They enable visitors to avoid the hassle of traffic jams and the search for a parking spot. They could be a great improvement on conditions at Hurricane Ridge (snow coaches in winter, Obstruction Point shuttle in summer), Sol Duc Hot Springs, and Hoh River Rain Forest, and they would head off greater traffic problems in the future.

We oppose the expanded development zones proposed in Alternative D at Hurricane Ridge, Sol Duc Hot Springs, and Elwha River – all key visitor-use areas accessible by roads. Hurricane Ridge is where most visitors experience the high mountains and observe the birds, mammals and plants found there. It is in the sub-alpine zone, where the meadows and fir forests intermingle, and where buildings and roads can only mar the landscape. Please keep Hurricane Ridge natural, and use the existing road, visitor center and concession building as the only intrusions. At Sol Duc and Elwha, the scarce, low-elevation floodplain lands bearing old growth forest are a treasure for visitors, a wild setting that is readily accessible for bird-watching and easy hiking. Expansion of buildings and facilities there should be avoided. The gateway communities outside the park are already providing lodgings and campgrounds to serve park visitors and should be encouraged to expand those businesses to meet growing demand, without imposing any impacts on these key areas of the park.

#### **Wilderness Areas**

Olympic is fortunate that some 95 percent of the park has already designated as wilderness by Congress. We favor wilderness studies for Ozette Lake, Pyramid Peak ridge north of Lake Crescent, and the boundary additions including Ozette Lake, so these areas can receive consideration for protection as wilderness.

Alternative D contemplates maintaining or rehabilitating up to 50 structures and altered landscapes in the wilderness areas of the park, on grounds they are “historic.” The existence of old buildings does not mean that they are automatically historic structures that must be maintained. Here in our region, Shenandoah National Park has several areas designated by Congress as wilderness, and we know of only one cabin maintained in them (the historic Corbin cabin). Many decaying remnants of old cabins can be seen in the Shenandoah wilderness areas, dating from the years when these mountains were settled and farmed. The Shenandoah example should inform your decision for Olympic.

We question the partition of Olympic wilderness into three zones (Primeval Zone, Primitive Zone, and Wilderness Trail Zone). The Wilderness Act does not call for any such zones. The zones could imply that some parts of the wilderness will be less protected than others. Some of the facilities mentioned in the DEIS appear inconsistent

with the Wilderness Act. We urge NPS to resolve this and other issues of wilderness stewardship in a wilderness management plan.

**Boundary Additions**

We favor the boundary additions described in Alternative B, in which lands essential for park purposes would be added around Ozette Lake following the hydrographic divide, north of Lake Crescent in the Lyre River and Boundary Creek watersheds, and on the Hoh, Queets and Quinault Rivers. All these additions will yield important benefits for wildlife values, including fish spawning waters, lowland elk habitat, and many species of birds associated with those habitats. The reduced additions in Alternative D would leave parts of the watersheds open to logging, with resultant impacts on the downstream lands inside the park.

**Rivers and Coastline**

The ecological health of the 13 rivers in Olympic National Park is important to visitors who go there to observe nature. The rivers should receive more protection in the plan. We favor the “river protection zones” proposed in Alternative B, to give higher priority to restoration of natural riparian and aquatic ecosystems, the native runs of salmon and steelhead, and the birds and mammals that are part of those ecosystems. The “armoring” of river banks and channelization (as at Finley Creek) work against naturally functioning ecosystems.

We urge NPS to carry through with studies of all 13 rivers under the Wild and Scenic Rivers Act, instead of only the Elwha. It is now 38 years since the WSR Act became law, and it is high time the rivers of the Olympic Range were given the consideration and protection they deserve.

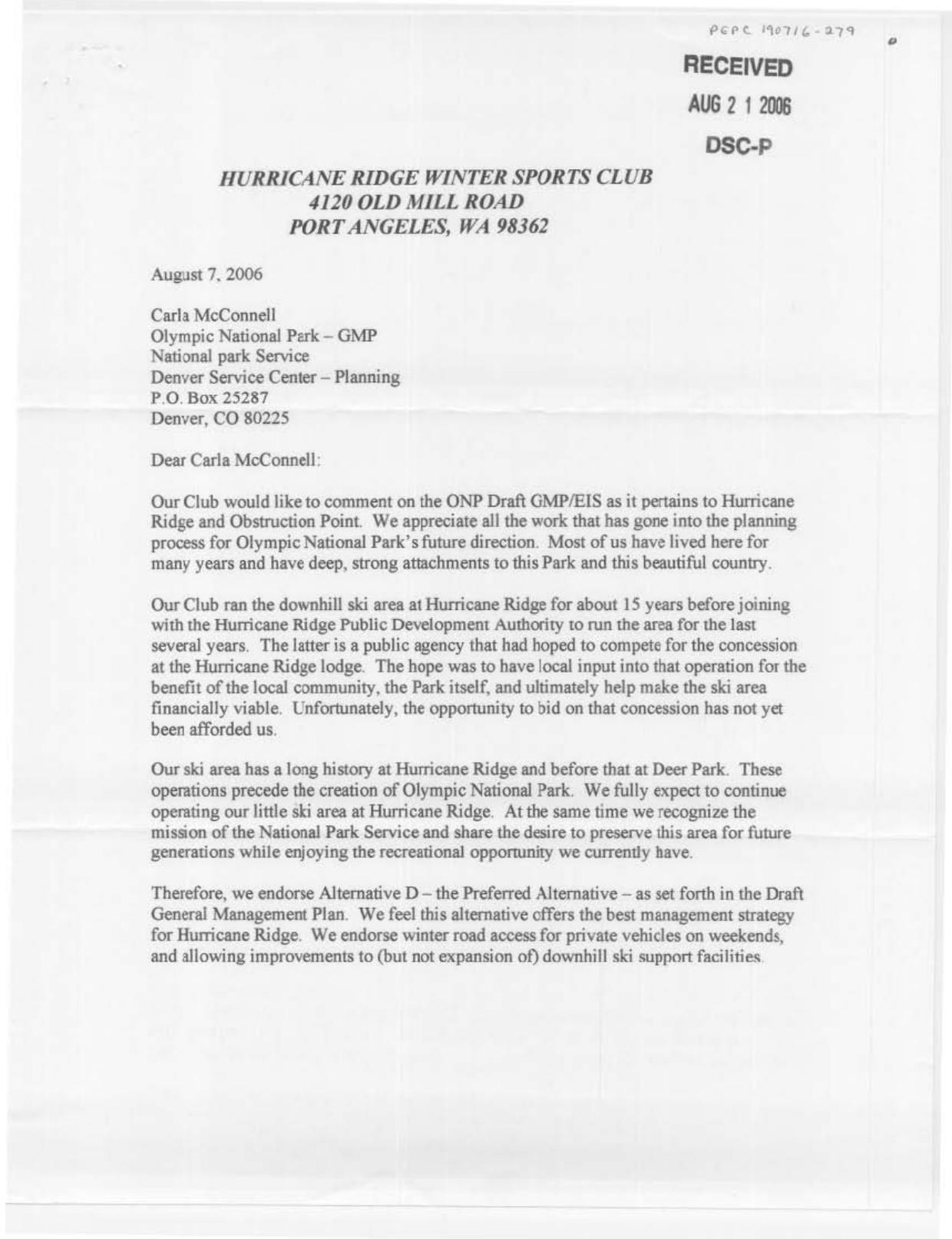
We favor the “intertidal reserves” proposed in Alternative D for the Olympic coast. The intertidal habitat is essential for birds, as the invertebrates found there are a vital food source for migrating shorebirds as well as resident species. The intertidal reserves would fill a gap in protection between the Marine Sanctuary and the protected landscape above high tide.

Thank you for the opportunity to submit these comments.

Sincerely,

Kurt R. Schwarz  
Conservation Chair

Comment 279-Hurricane Ridge Winter Sports Club



PCPC 190716-279

RECEIVED

AUG 21 2006

DSC-P

**HURRICANE RIDGE WINTER SPORTS CLUB  
4120 OLD MILL ROAD  
PORT ANGELES, WA 98362**

August 7, 2006

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

Dear Carla McConnell:

Our Club would like to comment on the ONP Draft GMP/EIS as it pertains to Hurricane Ridge and Obstruction Point. We appreciate all the work that has gone into the planning process for Olympic National Park's future direction. Most of us have lived here for many years and have deep, strong attachments to this Park and this beautiful country.

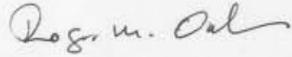
Our Club ran the downhill ski area at Hurricane Ridge for about 15 years before joining with the Hurricane Ridge Public Development Authority to run the area for the last several years. The latter is a public agency that had hoped to compete for the concession at the Hurricane Ridge lodge. The hope was to have local input into that operation for the benefit of the local community, the Park itself, and ultimately help make the ski area financially viable. Unfortunately, the opportunity to bid on that concession has not yet been afforded us.

Our ski area has a long history at Hurricane Ridge and before that at Deer Park. These operations precede the creation of Olympic National Park. We fully expect to continue operating our little ski area at Hurricane Ridge. At the same time we recognize the mission of the National Park Service and share the desire to preserve this area for future generations while enjoying the recreational opportunity we currently have.

Therefore, we endorse Alternative D – the Preferred Alternative – as set forth in the Draft General Management Plan. We feel this alternative offers the best management strategy for Hurricane Ridge. We endorse winter road access for private vehicles on weekends, and allowing improvements to (but not expansion of) downhill ski support facilities.

Olympic is a very special place and we appreciate the stewardship provided by the National Park Service. We hope to continue our mutually beneficial relationship.

Sincerely yours,



Roger M. Oakes, President  
Hurricane Ridge Winter Sports Club

CC: Board Members  
Mr. Steve Oliver, President, HRPDA

Comment 563-Juan de Fuca Scenic Byway Association

Juan de Fuca Scenic Byway Association  
Strait of Juan de Fuca Highway SR112  
A National Scenic Byway  
P.O. Box 188  
Joyce, Washington 98343

PEPC 191200 -  
563

RECEIVED  
OCT - 4 2006  
DSC-P

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

September 28, 2006

Dear Ms. McConnell,

Thank you for an opportunity to comment on the Draft General Management Plan for Olympic National Park.

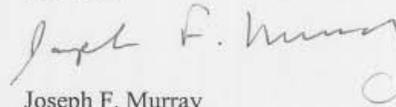
Several members of the Juan de Fuca Scenic Byway Association attended open houses sponsored by the Olympic National Park. The Park staff was on hand to inform the public of their plans. Comments were accepted in writing and by taped recordings. It was unfortunate that an open public forum at which local citizens could speak was not allowed, because the passion of an individual's position was lost to the Park as well as to the other participants.

"However, the four county region is not affected due to the size and diversity of the regional economy." This conclusion is stated in the section "Local Economies" under the part of the document titled "Impacts to the Socioeconomic Environment." This seems to show the Park's lack of understanding of our local economies. The local economy in the Clallam Bay/Seki area and other parts of the Western Olympic Peninsula, essentially the economy on the West End is driven by natural resources and tourism. The East side of Olympic National Park has larger more diversified economies in the urban areas. Most of commercial forest land that would become part of the Park is on the west side of the Peninsula, this will cost direct job loss to those employed in the forest as well as in the communities supported by the forest. Your preferred 'Alternative D' will cost our community jobs which are essential to our socioeconomic environment.

Reducing motorized boating would reduce local and tourist use of the Ozette Lake and corresponding economic activity. This is yet another example where the Park has overlooked the interests and economic well being of our West End communities. The Juan de Fuca Scenic Byway Association has a strong interest in keeping/maintaining existing recreational opportunities for both local residents and travelers. Outdoor recreation is a major element in the area's quality of life and a draw for tourism.

Perhaps these comments will inspire the Park to reassess their beliefs about the West End and develop an understanding of the people who live and work in the area. 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. We would recommend that the Park take a less imperial approach and talk with the people, not at them. Olympic National Park should develop a plan around 'Alternative A' which allows for the maintenance of existing park lands, roads and developed areas. This will help move the community's interaction with the Park from one where the Park draws conclusions prior to asking for input to one where the Park consults with the community to develop balanced solutions.

Sincerely,



Joseph F. Murray  
President

Juan de Fuca Scenic Byway Association

Comment 262-Llama Ladies

PEPC 190698-262 ✓

**Olympic National Park  
Draft General Management Plan**

Summer 2006

National Park Service  
U.S. Department of the Interior



**COMMENT SHEET ONP - GMP**

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

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**Personal Information**

First Name: Dee Middle Initial G,  
 Last Name: Christensen  
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 Address 1: 656 Sutter RD  
 Address 2:  
 City: Port Angeles State/ Province WA  
 Postal Code: 98362

E-mail: johndee@olympen.com

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.

1. Wilderness Area- keep open trails, bridges, campsite  
for hikers & stock.
2. OPTION IN PLAN TO PARTNER WITH NPS & TRIBES TO  
access trails into areas that cross both boundaries
3. Areas now accessible to public should be enhanced-  
ie Hurricane Ridge, Deer Park, Marmose etc. PLANIC  
preferred
4. Better trail to SITT SHI BEACH After Makah Reservation  
trail ends-

5. Sol Duc Hot Springs - keep open !!  
Important tourist destination and popular  
local use -

6. Overall statement:

Plan D - prefer for all wilderness  
areas

Plan C - prefer for already easily  
accessible use - older generation,  
children, physically impaired

Other members present today

JAN HURWORTH

Ann Butler

Debbie Simers -

Comment 458-The Mountaineers

YEP 190956-458



Founded in 1906  
to Explore,  
Study, Preserve,  
and Enjoy the  
Natural Beauty  
of the Outdoors

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OCT - 2 2006

DSC-P

September 28, 2006

Olympic National Park  
National Park Service  
Denver Service Center  
P.O. Box 25287  
Denver, Colorado 80225

RE: Draft Olympic National Park General Management Plan

Dear National Park Service Administrator:

The Mountaineers, with over 10,700 members, is one of the premier outdoor recreation and conservation organizations in the Northwest. We actively pursue mountain-based recreation in the Northwest, and are equally fervent about the conservation of our natural resources. We therefore care deeply about the future of Olympic National Park (ONP) and wish to submit the following comments regarding the draft General Management Plan for ONP. Please consider our comments carefully as you revise the draft plan.

Our members have explored the Olympic peninsula since the club's founding in 1906, and we have been deeply involved in deliberations about management of ONP for many years. We worked to establish the National Monument that preceded the park's creation, and our interest, along with that of other conservation organizations, has focused on opposition to reducing the size of the park and to creating or maintaining roads that would despoil wilderness. We have also actively supported additions to the park that would further enhance wildlife habitat while increasing recreation opportunities in an ecologically responsible way. We also protested the proposed land deletions in the 1940's and 50's that would have allowed cutting in the Sol Duc and Quinault forests, and illegal "salvage logging" in the 1950's proposed under the guise of public safety. We opposed the removal of the private lands in the Lake Quinault area of the park that now provide valuable elk habitat, and supported the additions of the Queets, Ocean Strip, and Shi Shi areas to the park. We also protested the "ocean highway" proposals in the 1950's and 60's, and continue to encourage the removal of the non-native goats that have no natural enemies and seriously degrade the mountain meadows.

We stress these past activities to emphasize the Mountaineers extensive interest in maintaining and enhancing the wilderness character of ONP and to establish the basis of our following specific comments, all of which focus on our sense of serious threats to the Park's wilderness character contained in the draft management plan. We must express our disappointment that a long overdue Wilderness Management Plan is not adequately addressed within this management plan. In fact, we find several instances where the Park's wilderness is jeopardized by recommendations within the preferred alternative.

ONP General Management Plan comments  
Conservation Executive Committee, The Mountaineers

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Without a comprehensive wilderness plan, the General Management Plan cannot be complete or true to the enabling legislation of the Park or the Federal Wilderness Act. We wish to remind you that the Park was established to protect the grandeur of the Olympic Mountains; portions of the ancient forests that reach from sea level to the mountain valleys; the rivers that flow from their glaciers and snowfields; and the great variety of wildlife whose home is this magnificent Park. ONP is a substantial portion of the Olympic Peninsula's ecosystem and an important Washington State natural resource for fish, wildlife, clean water, clean air, and responsible recreation. We believe that a management plan should be adopted that emphasizes, rather than jeopardizes, the essential wilderness character of the Park, and we therefore wish to make the following specific points based on this belief.

1) The preferred alternative does not guarantee sound wilderness management. It places far too much emphasis on the preservation and rehabilitation of dozens of structures built in the 30's & 40's that today are not needed by visitors or for the administration of the wilderness areas where these structures stand. Despite the management plan's contention that historic structures of all types "enhance wilderness character," this claim has been refuted in several successful federal lawsuits. The latest case was the attempt to place two "historic" shelters in the backcountry wilderness. According to the Historic Preservation Act, historic structures, especially those that can be found or replicated elsewhere, do *not* have to be maintained in place. Further, the introduction or maintenance of such structures violates provisions of the Wilderness Act.

2) The preferred alternative suggests that wilderness boundaries should be changed to permit relocating roads in river flood plains. Roads in flood plains are not only costly to maintain but also the frequent washouts and subsequent rebuilding of roads damage precisely the fish and wildlife habitat that the Park should be protecting. We thus definitely oppose changing wilderness boundaries for the sake of activities that violate the very wilderness that the Park is supposed to maintain! For example, as we learned from the washout on the Queets River, access to the Queets can be adequately obtained from Forest Service and Washington Department of Natural Resources roads. The first consideration for maintaining roads in floodplains should be resource preservation, not access. The Dosewallips River road is a further example of attempts to restore a road to the detriment of nature. Restoring the Dosewallips would remove huge old-growth trees, damage bird and fish habitat, and place the road on a hillside that would almost certainly wash out later while intruding on the wilderness character of the Buckhorn Wilderness. While the latest washout is on Forest Service land, and affects access to the Park's Dosewallips campground, we argue strongly that decisions such as these should emphasize maintaining wilderness and preserving wildlife habitat, not human access to trails or campgrounds. The National Park Service should be sensitive to these issues and support the best actions necessary to preserve the wildlife in and around the Park.

The Mountaineers is against the reestablishment of road corridors, whether within the flood plain or in the forested uplands, that are negatively impact these resources and that requires Congressional authorization of altering wilderness boundaries. The ONP General Management Plan should adopt a roads network management policy that decommissions those roads, not rebuilding them.

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Conservation Executive Committee, The Mountaineers

3) Maintaining the Park according to the Wilderness Act of 1964 provides outstanding management guidelines for a park that has been essentially designated as wilderness under this Act. It reduces the need for maintenance of buildings and roads and the resulting costs. Precious resources can be best used for trail maintenance, scientific research, and visitor interpretation. Wilderness national parks should not replicate city parks, state parks, recreational areas, or amusement parks on a grander scale. They are places where humans visit and leave no trace. Facilities needed for human comfort that cannot be carried on one's back should be located outside a de-facto and de-jure wilderness park.

Attempts to zone wilderness have no factual basis in the Wilderness Act and should never be used in a wilderness plan or for management of any wilderness areas of the Park. Removal of vegetation around "historical" buildings in wilderness to protect the structure from fire only degrades the wilderness in order to preserve a structure within wilderness in the event of fire. As we state above, the main priority of ONP management should be maintaining the Park's essential wilderness qualities, not unnecessary and intrusive structures.

4) Large concentrations of developed campsites even near the Park's entrances would inevitably degrade the wilderness, diminish wildlife habitat, and stress the surrounding landscape. Large campgrounds, especially approaching 250 campsites, would increase tensions among visitors, increase the need for law enforcement, disrupt wildlife, and cause large areas of vegetation to be trampled. Tourist concentrations should be provided in the communities surrounding the park, not within the Park's de-facto wilderness.

5) The Mountaineers support the Park's rivers being kept wild for fish and wildlife enhancement. We oppose rebuilding or repairing roads that damage the riparian areas. We strongly support the protective "river zones" as displayed in Alternative B. The rivers are vital as wildlife habitat, both for the fish within them and also for the other natural processes that depend on the river system. A natural Northwest forest depends on the salmon that return to spawn and a biological system that allows spawned carcasses to be left in the river to feed their offspring and other wildlife that, in turn, feed the surrounding plants and trees. Impediments to this process degrade the natural process of the whole riparian system. Regarding specific river systems, we prefer that ways be found to solve the stone accumulation problem at the bridge on Finley Creek other than the annual bulldozer removal. We agree with the proposal to designate the Elwha River as a Wild and Scenic River and believe that all the rivers within the Park should be included in the Wild and Scenic River System.

The club also agrees with the proposed addition of the Ozette Lake river system to the Park. This addition would protect fish and wildlife, and protect the Lake Ozette basin from pollution and siltation created by logging, road building, and other commercial activities. We wish to remind you that the Ozette Lake sockeye have been listed as a threatened species, and actions to secure this species' recovery are urgently needed.

ONP General Management Plan comments  
Conservation Executive Committee, The Mountaineers

We support adding needed elk habitat in the Lake Crescent area. We further support the recommend additions to the Queets River corridor and habitat additions in the Hoh and Quinault river systems.

However, the preferred alternative park expansions do not always conform to natural watershed boundaries. As a result, these expansions do not do enough to protect our valuable salmon and wildlife by preserving river habitat and preventing activities that pollute and silt fish spawning and feeding areas within the rivers. We do support the land additions as displayed in Alternative B. We further advocate that more resources be used to protect salmon and other fish species for the enrichment of the Park and the entire Olympic Peninsula ONP is a magnificent example of a natural ecosystem, and we therefore encourage the expansion of educational and interpretive programs to better educate the public about the interrelationships of land, plants, animals, and water in such a large and critical ecosystem.

6) We strongly urge that the Park's administration begin immediately restoring wolves in the park as they have done for the fisher. We also wish to emphasize that the Olympic Elk were specifically named as a reason for initially establishing ONP, and we are concerned that park roads are providing access for elk poachers. We therefore oppose adding roads that would facilitate poaching and ask for greater surveillance to stop this activity. We also wish to add that maintaining the elk herds would provide a natural prey for wolves, and thus minimizing poaching would contribute to a natural balance between wolves and elk within the Park.

7) To help preserve these natural systems we encourage the use of bus systems in heavily used and developed areas of the Park. Encouraging bus systems could reduce law enforcement problems and poaching, and limit damage to heavily used areas. We also support the development of short, all-accessible loop trails in the Park's front country. These trails could support the educational and interpretive programs that should be available to visitors, exposing them to the Park's many wonders.

Given these specific points, the Mountaineers believe that finalization of the General Management Plan should occur only *after* the development and subsequent public review of an extensive and well coordinated wilderness plan for ONP. Given the essential wilderness character of most of the Park, we believe strongly that the main goal of any new management plan for ONP must emphasize maintaining the wild character of one of the nation's most magnificent national parks.

In summary, the General Management Plan should:

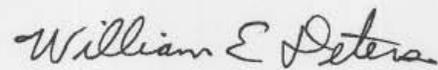
- Prioritize the preservation of ONP's natural systems, restoring threatened wildlife, and protecting the integrity of its world-class wilderness as the highest priority;
- Expand park boundaries in five areas (Ozette Lake, Lake Crescent, the Hoh, Queets and Quinault watersheds) to protect critical habitats for salmon and wildlife as proposed in Alternative B;
- Establish river protection zones to ensure that critical salmon habitats and natural river processes are preserved as proposed in Alternative B;

ONP General Management Plan comments  
Conservation Executive Committee, The Mountaineers

- Recommend all 13 eligible rivers for federal Wild and Scenic River designation;
- Restore extirpated species like the wolf and fisher into the Park through a reintroduction program;
- Keep developed areas at their current size as described in Alternative A. New recreational developments are best located outside the ONP;
- Defer all related all decisions to wilderness until a comprehensive wilderness management plan is completed and available for public review;
- Establish intertidal preserves on the Park's wilderness coast to protect biologically rich marine areas;

The Mountaineers appreciates this opportunity to comment on the current draft management plan, and wishes to be kept informed of future development of this plan.

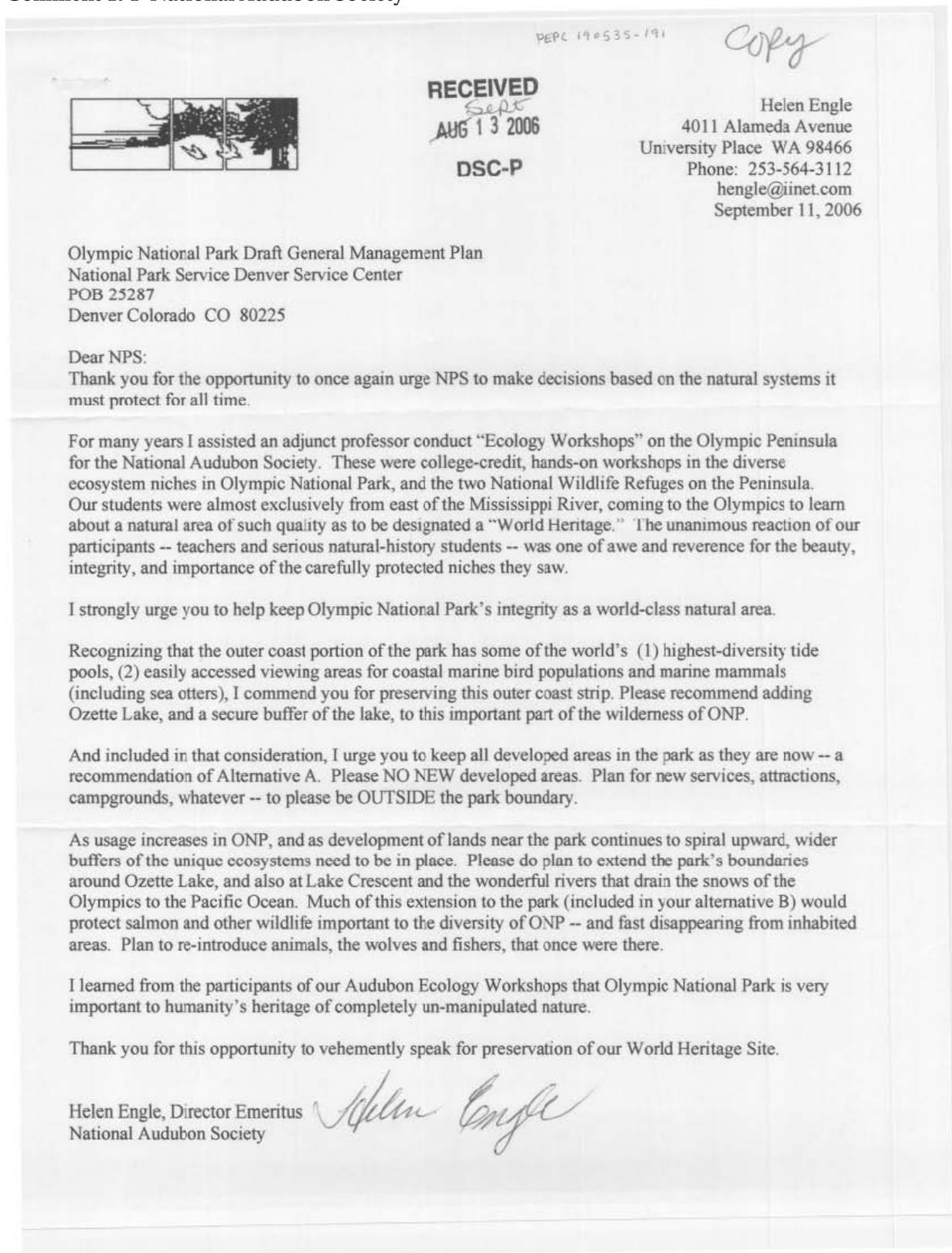
Sincerely,



William Deters, President

ONP General Management Plan comments  
Conservation Executive Committee, The Mountaineers

Comment 191-National Audubon Society



Comment 505-National Outdoor Leadership School Pacific Northwest

PEPC 191023 - 505

September 29, 2006

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

**RE: General Management Plan**

The National Outdoor Leadership School (NOLS) submits this letter of comment on the Olympic National Park Draft General Management Plan (GMP). NOLS is a non-profit educational organization, teaching backcountry wilderness skills and leadership to students of all ages from five locations in the U.S. and four international schools. In the U.S., we are a fully permitted, fee-paying operator on public lands. **Holding 21 separate permits to teach students in national parks, we have a keen interest in the future of park system management** and a solid foundation of experience from which to provide comment.

NOLS appreciates the opportunity to provide input on the draft plan. Overall we **believe the preferred alternative provides an excellent balance between natural resource protection and improving visitor access.**

- NOLS is pleased overall that the GMP designates 3 wilderness zones, the majority of wilderness being designated as primeval. The zone designations are appropriate, and lay a foundation for the WMP. The details of how these areas end up managed under the WMP will be critical.
- NOLS is pleased that under the preferred alternative, 35% of the Park's coastal strip would be designated as intertidal reserves. Protection of these intertidal zones is critical to the health of the coastal ecosystem. Permit limits, especially in high use seasons, and designated trailways would be appropriate future steps as part of the GMP or WMP processes.
- NOLS is pleased that the GMP increases universal access and front country opportunities, including **a greater emphasis on educational and interpretive programs**. Improved and expanded visitor facilities will also greatly assist in this effort, and help improve the experience of the vast majority of the visitors who do not travel far from their vehicle. Improving their experience, and their knowledge of the Park, will help create more stewards and proponents for the Park's future. We trust that when visitor facilities are developed or improved, those buildings will be **built in as sustainable a manner as possible**.

- NOLS is very supportive of an increased **focus on mass transit** to reduce vehicle use in some areas, especially Hurricane Ridge. NOLS also supports the **maintenance of existing road access** to the Park. The GMP should ensure that trail access is maintained for a variety of user groups, and there should be no net loss of trail access to any group including hikers and stock. Stock use on Wilderness trails, where appropriate, should remain open to all stock users, not just to special permitted Park Service approved pack strings or saddle horses.

*Our concerns:*

- The draft GMP is not explicit about how it will tie in with the long delayed Olympic National Park Wilderness Management Plan. Given the fact that Olympic National Park is 95% designated wilderness, the details of how the two plans will work together is critical. The WMP must follow in a timely manner.
- The GMP mentions that wilderness campsites will generally remain the same, though some may be relocated, modified or restored. The GMP goes on to explain that some wilderness areas of the Park may have limits established on numbers of campers. NOLS understands that some limits may need to be placed on overall numbers of campers in certain areas in order to protect resources, but we would be concerned if that was done through limiting group sizes below the current level of 12.
- The GMP mandates the protection of all historical and cultural properties in wilderness without evaluating the impact on wilderness character. Historic shelters have been allowed to fall into disrepair. Many are on eyesore. Given the budget challenges the Park continues to face, NOLS recommends that many of these wilderness based structures be removed rather than spend money trying in maintenance.

We appreciate the opportunity to share our views and look forward to continuing to work with the NPS to introduce the public to a superlative park. We hope that our input is helpful. If you have any questions or need additional information, please contact me.

Sincerely,

Mark Langston, Operations Manager  
NOLS Pacific Northwest  
P.O. Box 527

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