

Comment 454–National Parks and Conservation Association

PEPC 190952 -
454

September 26, 2006

Superintendent Bill Laitner
Olympic National Park
Draft General Management Plan
Denver Service Center
P.O. Box 25287
Denver, CO 80225

RE: Comments on Olympic National Park’s Draft General Management Plan

Dear Superintendent Laitner:

The idea of the National Parks is powerful and touches upon universal themes, hopes and beliefs such as wilderness, union, and struggle. More than 200 nations have copied our model. Some say that the National Park idea is one of the greatest gifts America has given to world culture; the National Parks Conservation Association agrees.

Organic Act

“To conserve the scenery and the natural and historic objects and the wildlife therein, and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (Organic Act 16 USC sec 1).

In 1916 Congress passed the Organic Act. This Act contains the precedent setting idea that the United States would protect its nationally significant irreplaceable resources in a National Park System. Furthermore, the Act makes clear that one of the NPS highest priorities is to provide recreation opportunities, however that recreation is to be limited to those activities which leave the resources and values contained in the park system unimpaired for future generations. This is the filter that all NPS decisions must flow through regarding the Olympic National Park general management plan (GMP).

Greater Good Alternative

NPCA applauds the National Park Service’s (NPS) effort at Olympic National Park to create a uniform and modern plan. Because of the vast array of natural and cultural resources the NPS must protect and changes in technology and society’s needs, we are highly encouraged by the NPS effort to create a guide that reflects current trends and conditions. The NPS draft management plan is a significant step in achieving the NPS

mission; we offer the following suggestions to aid the NPS in preserving all the resources of Olympic National Park from impairment.

To that end, we support the **Greater Good Alternative** (Guarding Resources, Transportation, Gateway communities and recreation Opportunities for our Decedents). This alternative, among other things, calls upon the NPS to finalize a plan with suggestions as contained in our Olympic "State of the Parks Report." A copy of that report is included with our comments.

Specifically, we ask the NPS to:

- *Increase natural resource research and monitoring.*

Research projects should include post dam removal on the Elwha River, long-term monitoring of spotted owls, marbled murrelets, and Roosevelt elk. Studies should also focus on the impacts of adjacent land use.

- *Acquire lands and habitat critical to wildlife, recreation and cultural resources.*

NPCA is especially pleased to see the NPS' preferred alternative includes several boundary adjustments including areas around Lake Ozette, Lake Crescent and Queets. We specifically support the NPS' proposed plan to acquire an additional 44,000 acres of private forestland to exchange with the state of Washington for mineral rights within the park.

However, we also encourage the NPS to consider the additional boundary adjustments as contained in Alternative B. In particular, NPCA supports additional adjustments in the Hoh and the Quinault areas.

Federal investment in National Parks has a significant positive impact upon regional economies. According to a recent NPS study it's estimated that national parks generate nearly \$5 of economic benefit for every tax dollar invested in park budgets. At Olympic alone, federal investment results in more than \$100 million in benefit to gateway communities as well as supports nearly 2400 local jobs. See Appendix 2 for more on this impact.

- *Support the removal of mountain goats, as well as examine the reintroduction of extirpated species such as the fisher and wolf.*

Mountain Goats, a non-native species, are of particular concern in Olympic National Park. First introduced in the 1920's, the Mountain Goat population has been estimated to be as large as 1,100 animals. Recent estimates put the number at

between 230 and 325 goats. These animals can negatively impact native ecosystems through grazing, wallowing, trampling, and eroding soils.

NPCA is pleased to see the NPS is working with the US Forest Service, the state of Washington and several Indian tribes to improve techniques for estimating goat populations. We encourage the NPS to take the lessons learned from these efforts and immediately apply them to future goats counts.

According to the NPS' 2006 Management policies, Sec. 4.4.2.3 the Park Service will actively undertake efforts to restore listed native species. NPCA is also encouraged to see the NPS is already engaged in a process that might ultimately lead to the reintroduction of the Fisher, a small weasel-like animal that is extinct in Washington state. NPCA supports this process. See Appendix 3 for NPCA's comments on the draft Fisher plan.

In addition, we ask the NPS to begin a process to examine the reintroduction of the grey wolf to the Olympic peninsula. Wolves once roamed the Olympic peninsula but systematic hunting, trapping and poisoning eliminated them by the mid 1930's. Reintroduction of gray wolves has been suggested on at least four occasions since the 1930s. Most recently, a 1999 study found that the Olympic peninsula might be a suitable site for wolf reintroduction.

According to Defenders of Wildlife, there are significant ecological benefits to wolf reintroduction. Most notably, wolves provide a population check upon large ungulates such as deer, moose and elk. Moreover, wolf reintroduction has been shown to have positive economic benefits. According to John Duffield, an economics professor at the University of Montana, Yellowstone wolves generate roughly \$70 million in regional benefits. The Olympic Peninsula could expect similar benefits.

Some may oppose wolf reintroduction citing concerns such as human safety. However, the Oregon Wolf Advisory Committee states that while wolves can pose a threat to human safety "generally, attacks by wild wolves on humans are a rare event and fatal attacks are very unlikely." See Appendix 4 for more on wolves.

- *Increase the study of and planning for park cultural resources.*

In particular, NPCA encourages the NPS to complete an archaeological study to describe and evaluate the condition of 99 percent of the park's 622 identified sites; an update of the 1988 Archaeological Overview and Assessment; surveys and evaluations of historic archaeological resources, a historic preservation plan to address all structures in the park that are at least 40 years old; and an updated List of Classified Structures that includes all of the park's historic structures.

- *Create Intertidal Reserves*

Olympic National Park protects more than 65 miles of undeveloped Pacific Coast. The coast is a mixing zone of southern and northern Pacific intertidal species. Additional protection for this area was afforded through the establishment of the Olympic Coast National Marine Sanctuary in 1994. However, NPCA is concerned about linkages between intertidal and nearshore environments and habitat for special species like the northern sea otter. These concerns relate to erosion and increased sedimentation loads from the mainland on the nearshore environment, as well as the effects of potential over harvest of marine organisms.

The ecological and economic benefits of intertidal reserves and marine protected areas are numerous. According to Christy Bell of the University of Santa Cruz, intertidal areas provide unique research and teaching locations. These reserves can also produce economic benefits by better preventing fish population crashes that force broad closures.

In addition, intertidal reserves are likely to benefit marine mammals such as the Orca and Sea Otter, as well as shorebirds and other mammals like the black bear. Specifically, intertidal reserves can benefit these species by providing undisturbed habitat and food sources. Intertidal reserves also serve as an ideal “outdoor research lab” for studying the impact of activities such as shellfish harvest and predation upon near shore ecosystems. See Appendix 5 for more on these benefits.

As such, we urge the NPS’ to include intertidal reserves as called for in Alternative C in its final alternative.

- *River Protection Zones*

Olympic’s rivers and streams are critical components of a healthy park. NPCA asks the NPS to establish river protection zones as contained in Alternative B. These zones will best ensure that critical salmon habitats, natural river processes, recreational opportunities and economic benefits are protected. In addition, we urge the NPS to recommend that all 13 eligible park rivers be included within the federal Wild and Scenic River program.

- *Wilderness Designations*

NPCA is disappointed that the GMP does not include a comprehensive wilderness management plan. As such we ask the NPS to defer wilderness designations until a comprehensive wilderness management plan is completed.

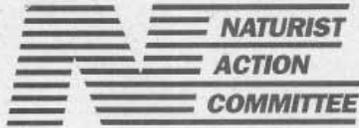
Conclusion

The Park Service's draft GMP for Olympic National Park is a significant step in the right direction. NPCA applauds the NPS for the time and energy that went into the drafting of this document. Yet, we urge the Park Service to adopt NPCA's "Greater Good" Alternative which calls for among other things: 1) increased natural resource research and monitoring; 2) adjustment of park boundaries to adequately protect resources, wildlife and gateway economies; and 3) creation of intertidal reserve zones.

Sincerely,

Sean Smith
Regional Director

Comment 353-Naturist Action Committee



PEPC 190832 - 353

RECEIVED

SEP 18 2006

DSC-P

P.O. Box 132 • Oshkosh, Wisconsin 54903 • (920) 426-5009 • Fax (920) 426-5184 • www.naturistsociety.com

Mark Storey
2142 N 147th Street
Shoreline, WA 98133
(206) 361-9428

September 14, 2006

Carla McConnell
Olympic National Park—GMP
National Park Service
Denver Services Center—Planning
PO Box 25287
Denver, Colorado 80225

Re: General Management Plan for Olympic National Park

Dear Ms. McConnell:

I appreciate the opportunity to offer public comment on a small portion of the General Management Plan for Olympic National Park (ONP) in Washington State. I'd like to address only Olympic Hot Springs, otherwise known as Boulder Hot Springs or Triple 21 Hot Springs. This natural water source flows into Boulder Creek, a tributary of the Elwha River near the northern border of ONP.

I am writing for the Naturist Action Committee, the "political" adjunct of The Naturist Society. TNS is a national organization that promotes and defends non-sexualized, responsible nude recreation on appropriate public and private lands. Many naturists (skinny-dippers, nudists, etc.) have enjoyed Olympic Hot Springs over the years, and many of *them* have contacted NAC recently regarding the present General Management Plan. The nude use—given what the ONP Park Planner and Deputy Chief Ranger at the site have told me—is not an issue at Olympic Hot Springs. However, many naturists in the Pacific Northwest are concerned that ONP may opt to destroy all of the existing pools at the springs in an effort to bring the site back to a more "natural" state, to reduce litter, to make the water more sanitary, and to offset problems often associated with overuse (e.g., illegal use of mountain bikes, and introduction of artificial objects such as carpeting and cement blocks).

The Naturist Society consists of The Naturists, Inc., the Naturist Action Committee, Inc. & the Naturist Education Foundation, Inc.

After speaking on the phone with various ONP officials and two local hot spring experts, the Naturist Action Committee wishes to urge ONP to include the following in any action it takes at Olympic Hot Springs:

A. Retain soaking at Olympic Hot Springs, but reduce the number of pools at the site to three or four, located near the main source of water. This will improve cleanliness by offering less restriction to flow and allow water to move more efficiently through the limited number of pools and out to Boulder Creek. It will also help rehabilitate the runoff area, reduce the impact of use, and enhance the integrity of the environment.

B. Contract the maintenance of the hot spring resource to an experienced caretaker. This approach has been implemented with great success by other agencies responsible for managing hot spring resources in the Pacific Northwest, such as at Cougar Hot Springs in Oregon.

C. Convert the road (Olympic Hot Springs Road) to a trail beyond the Altair site. This is similar to an item proposed in Alternative B of the draft of the General Management Plan.

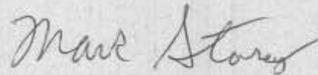
Rehabilitation of Olympic Hot Springs does not require that the resource be made unusable for those seeking remote recreational experiences. Other details of Alternative D, the NPS-preferred plan, accommodate traditional uses, and the traditional use at Olympic Hot Springs should be among those that are retained.

Naturists in this region are well aware of their responsibility in helping to maintain the ecological integrity and social health of this gem of a site. The Naturist Action Committee has already begun to develop a group of volunteers in the region who wish to assist ONP with any cleanup, trail maintenance, or other work that the Volunteer Coordinator (Maggie Tyler) thinks appropriate.

Thank you for your time. The Naturist Action Committee looks forward to working with ONP in any way we can to preserve both the human use and environmental soundness of Olympic Hot Springs.

Please feel free to contact me if you have any questions regarding the Naturist Action Committee or our interest in Olympic Hot Springs.

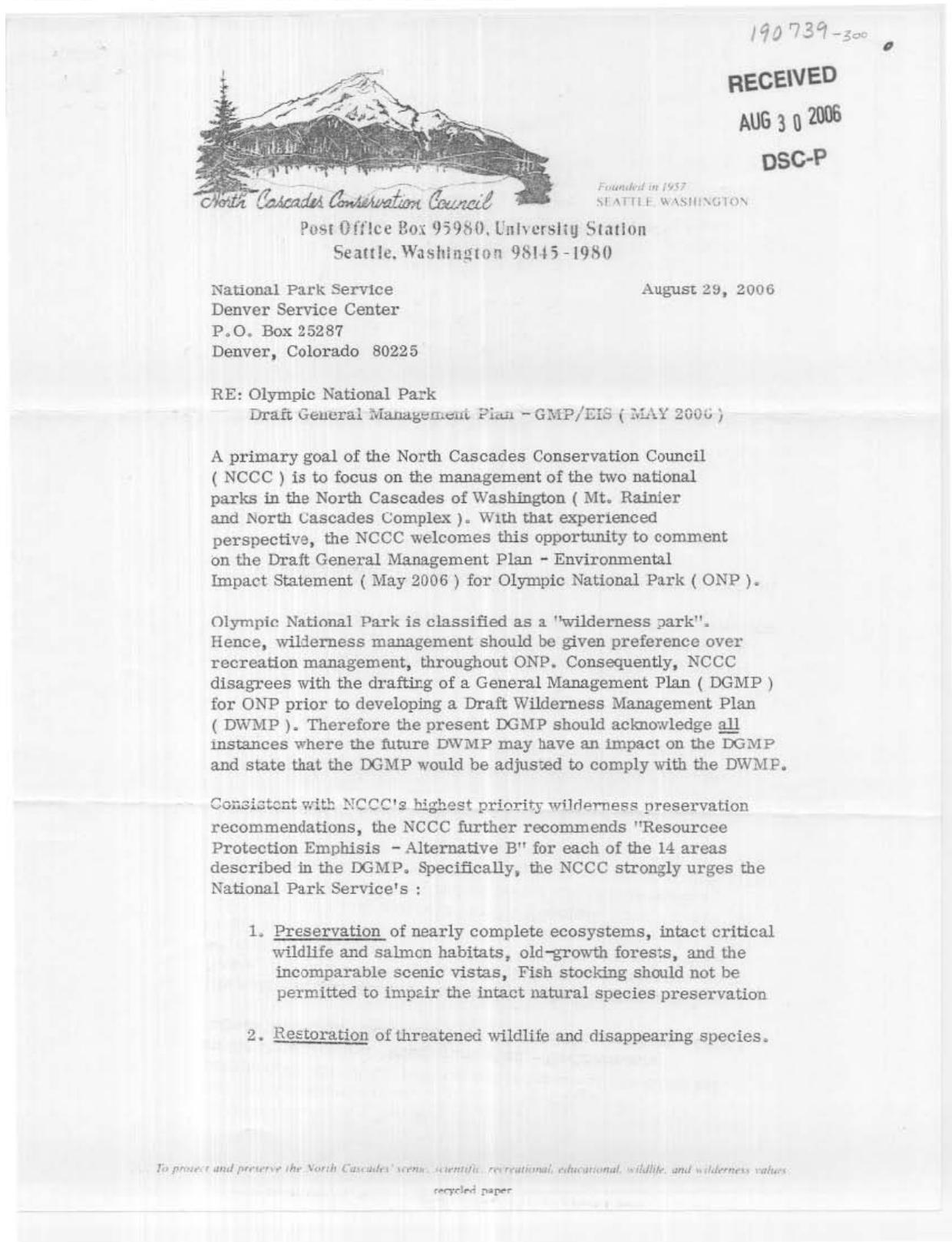
Sincerely yours,



Mark Storey
Naturist Action Committee (www.naturistaction.org)
The Naturist Society (www.naturistsociety.com)

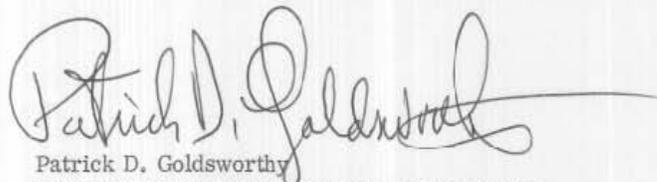
Cc: Nancy Hendricks, Park Planner, ONP
Susan K. McGill, Acting Superintendent, ONP

Comment 300-North Cascades Conservation Council



- 2 -

5. Designate, as part of the Wild and Scenic River Act, those eligible portions of the Bogachiel, Ozette, Calawah, Queets, Dosewallips, Quinault, Duckabush, Elwa, Skokomish, Gray Wolf, Sol Duc, and Hoh Rivers and Royal Creek.
6. Expansion of the ONP boundaries, in Alternatives B, to protect critical habitats for salmon and wildlife, to include the entire Lake Ozette watershed, and increased watersheds of Lake Crescent and the Hoh, Queets, and Quinault Rivers.
7. Development of new recreational facilities should occur outside the ONP boundaries.
8. Management of access to ONP by :
 - a. monitoring and regulating stock use to minimize detrimental impacts in trails and prohibiting grazing within ONP.
 - b. Prohibit all mechanized use (bicycles and motor bikes) on trails in ONP to prevent degradation of, and competition with, peaceful pedestrian use.
 - c. Prohibit off road vehicle (ORV) use on any roadless area within ONP.
 - d. Regulate private vehicular use to prevent excessive congestion and substitute shuttle service alternatives.



Patrick D. Goldsworthy
Chairman North Cascades Conservation Council
P.O. Box 95980, University Station
Seattle, Washington 98145 - 2980

Comment 478-National Coast Trail Association

PEPC 190995 -478



P.O. Box 11045, Portland, Oregon 97211-0045 - (503) 335-3876 - www.coasttrails.org

“Keeping The Coast For Everyone”

Through Advocacy, Education and Action
For Trails, Public Access and Coastal Preservation

September 30, 2006

Bill Laitner, Superintendent
Olympic National Park – GMP
National Park Service
Olympic National Park Headquarters
600 E. Park Avenue
Port Angeles, Washington 98632-9798

Hello:

Comments Consistent with National Park Service Mission

The Organic Act of August 25, 1916, states that the (National Park) Service . . . shall promote and regulate the use of Federal areas known as national parks, monuments and reservations . . . to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”It is further noted on the official National Park Service website in their “Mission” section that “The National Park Service still strives to meet those original goals, while filling many other roles as well: guardian of our diverse cultural and recreational resources; environmental advocate; world leader in the parks and preservation community; and pioneer in the drive to protect America’s open space.”

Therefore, this letter represents the National Coast Trails Association’s comments and input on the Draft General Management Plan/Environmental Impact Statement for Olympic National Park that we believe is consistent with the stated mission and roles of the National Park Service. The comments provided focus on our organization’s goals of trail development, enhancement, management and maintenance; and the protection of land and sea within the trail corridor relative to both the “Olympic Coastal Strip” portion of the “Washington Coast Trail” and the developing “Olympic Discovery Trail” within and adjacent to the boundaries of Olympic National Park.

Vision and Relevant Goals of the National Coast Trail Association

The National Coast Trail Association's vision is the "National Coast Trail," a land and water-based trail system around the United States providing non-motorized recreational opportunities to experience the natural, historic and cultural resources along its length. Our priority goal focuses on America's 1,800-mile "West Coast Trail," a hiking trail from Cape Flattery, WA to the Mexican border in California. The "Washington Coast Trail" represents the northern 200-mile section of the West Coast Trail, and the Olympic Coastal Strip a very important segment through Olympic National Park. Also, the Olympic Discovery Trail, another important segment through the park and also the western terminus of the "Pacific Northwest Trail," represents the western end along the entire northern route section of the National Coast Trail vision from the Atlantic to the Pacific Ocean.

Support Alternative "D" But Modify to Emphasize Resource Protection For Olympic Coastal Strip and Lake Crescent

The National Coast Trail Association supports "Alternative D," the National Park Service's preferred alternative with a general management emphasis both on protecting resources and improving visitor experiences. However, in relation to the relatively narrow, isolated and unique coastal wilderness lands of the park's "Olympic Coastal Strip" and the lands north of Lake Crescent we propose that future park management should emphasize natural resource protection, and the preferred alternative modified accordingly.

Boundary Adjustments

Ozette

The trails, beaches and rocky shoreline along the Olympic Coastal Strip from the northern boundary of the park with the Makah Indian Nation to the southern boundary of the park north of the Queets River represents a significant section of the Washington Coast Trail. Important spur trails from the coast are those that take the hiker inland to Ozette Lake. Therefore, in order to begin to enhance opportunities for public enjoyment for those using these spur trails to the Ozette area, we note that the boundary adjustments proposed under both alternative C with a visitor opportunities emphasis south to Bristol Point and alternative D south beyond Bristol point at the very minimum should be included in the final GMP. However, given the relatively narrow area of the entire Olympic Coastal Strip – and its unique significance as true coastal wilderness – it would seem both apparent and appropriate that the value of boundary adjustments which provide at least one much larger area of protected habitat along the coast could not only increase the population of resident species but extirpated species could either re-establish themselves or be reintroduce with success. The rationale being that protection of a much larger area could potentially provide trail users a greater opportunity to experience wildlife both along the immediate coast and the lake plus protect the viewshed up to the surrounding ridges around the lake. Finally, therefore, we propose that both visitors and resource protection values are best achieved by including the resource protection emphasis of alternative B for boundary adjustments in the Ozette Lake area.

Lake Crescent

A segment of the Olympic Discovery Trail not only utilizes the Spruce Railroad Trail along the northern edge of the lake, but also has a spur route coming from the north along the eastern side of the Lyre River. Therefore, in order to enhance opportunities for public enjoyment for those using the trail in this area, we propose not only that the boundary adjustments proposed under alternative "B" with a resource protection emphasis be included in the final GMP but also extended west to include all existing US Forest Service lands in Olympic National Forest to the existing north-south ONP boundary about 1-2 miles west of Fairholme Campground. The rationale being that protection of this area could potentially provide trail users a greater opportunity to experience both land-based and aquatic wildlife and protect the viewshed along the crest of the mountain ridge just north of the lake not only through additional habitat and potentially a migratory corridor, but also by protecting the Lyre River watershed.

Olympic Coastal Strip

Given what we've already stated, especially above relative to the Ozette area, we also propose that boundary adjustments are made that would essentially be expanded east in sections of the strip where present boundaries are less than 1-mile wide. The goal would be to establish at least a 1-mile wide corridor to enhance wildlife habitat and migratory corridors, thereby enhancing opportunities for enjoyment by trail users for increased wildlife viewing along the entire coastal strip.

Second Beach Trail

Given the current situation of closure of the trail to "Second Beach" by the Quilleute Tribe, we would propose resolving the issue to provide public access along this trail to the coast. We realize this is an issue that needs to be resolved by both the National Park Service and the Quilleute Tribe, however, one solution relative to boundary adjustments, that we simply as one potential option would be to explore the possibility, and only if the tribe is willing, of considering a trail easement, and hopefully in perpetuity. Once again, we are only offering this as potential solution for consideration by those parties involved, and hope for future cooperation and consensus between the tribe and the park to resolve the existing access issue to the beach.

Natural Resources

Given the rationale, goals and values already expressed relative to the proposed boundary adjustments above for Ozette, Lake Crescent and the Olympic Coastal Strip as a whole, we propose that a primary objective for Olympic National Park would be to essentially restore natural ecological processes to systems altered by humans. This would include both the areas within their current boundaries and beyond as extended boundary adjustments are realized.

Cultural Resources

Given any specific cultural resource questions involving its proper care and how it should be managed in wilderness areas might best be answered by a process that allows key stakeholders, park staff and even visitors first determine its significance, and then consider and craft a management solution for each one. What could be called the mission of the NPS “to conserve . . . and to provide for the enjoyment” of these and other resources suggests the desired goal for any specific cultural resource. Since the National Coast Trail Association values cooperation and consensus, we therefore propose that a cooperative process involving public and staff be developed and implemented to first determine the significance of any cultural resource, and then to reach a consensus as to how to manage each one to conserve and provide for its enjoyment. Finally, in cases where the objective to conserve a significant cultural is in conflict with providing for its enjoyment, we propose that the primary goal should then become resource protection, i.e., that general public access would not be encouraged or allowed.

Tribal Relations

One primary way the National Park Service could work with the tribes to improve cooperation and coordination and achieve other goals would be to develop and always maintain a working relationship of mutual trust and respect. One initial strategy could simply be to ask tribal leaders for their input about how they think the park could better work with them when providing for visitor opportunities and protecting resources are mutually-shared goals or at least not in conflict with tribal values and goals. Our comments here simply reflect our approach of working cooperatively with others to achieve mutual goals, and although not offered as specific proposals, are given for both NPS and tribal consideration.

Partnerships

We propose that what has already been stated relative to both cultural resources in terms of developing a cooperative process and in general to tribal relations could be adapted and applied to develop and work effectively in terms of partnerships for the protection and visitor enjoyment of park resources. The extent to which the park could develop partnerships could potentially range from a simply expressed willingness to a formal written agreement, such as a Memorandum of Understanding, or even entering into a legal document, to work with the park. Once again, it would seem crucial that partners would either have mutually-shared or complementary goals to maintain a successful partnership. Regarding the Olympic Discovery Trail we would propose the park initiate and cultivate a relationship with the Peninsula Trails Coalition.

Wilderness

We have already addressed what we feel are the appropriate boundary adjustments in order to fulfill the park’s mission, purpose and significance and will therefore focus on what experiences, resource conditions and facilities are consistent with wilderness values. Our focus here will be the Washington Coast Trail along the Olympic Coastal Strip with a brief comment on the section of the Olympic Discovery Trail just north and along Lake Crescent.

Washington Coast Trail

Facilities along the Olympic Coastal Strip should primarily focus on the goals of minimizing overall impact, and providing for sanitation and emergency survival. Given the popular usage of the Olympic Coastal Strip by hikers and backpackers especially during the summer months we propose providing simple enclosed structures for solid human waste disposal in appropriately spaced locations and consistent with the protection of wilderness and resource protection values. Given the potential for developing hypothermia from exposure even during the summer season and the potential for heavy rains and high winds we would propose simple elevated emergency shelters with a roof and three walls be installed in appropriately spaced locations and consistent with the protection of wilderness and resource protection values.

Experiences for the hiker and overnight backpacker along the Olympic Coastal Strip should simply be that of the unique coastal wilderness found there. Defining what the "Olympic wilderness coastal experience" is and how it can be protected, enhanced and restored should be primary goals. However the wilderness coastal experience is defined, it always needs to remain the guiding principle for future management actions. Essential components of this definition would include being able to experience the sights, sounds, and smells, and potentially even the tastes and tactile sensations associated with coastal wilderness. Visually this would include both plant and animal wildlife in terms of both landscapes and seascapes – out as far as the immediate horizon -- through the protection, enhancement and restoration of the coastal wilderness viewshed. Two examples, Ocean Power Technologies is a US firm developing a "PowerBuoy" that floats offshore to extract energy from ocean waves, and inland cell towers could be proposed. Under the proposed "coastal wilderness policy" to avoid their visual impact, their installation along the Olympic Coast Strip would simply not be allowed. This policy would also include the value of both natural soundscapes and lightscaapes. The answer as to how wilderness could be protected, enhanced and restored has already been stated earlier in this letter.

Resource conditions along the Olympic Coastal Strip have already been addressed earlier in this letter and focus on achieving the primary goal of both protecting the existing coastal wilderness ecosystem and restoring it, especially where disturbed by human activities. However, as a final but significant comment regarding the restoration and viability of the existing wilderness ecosystem immediately along the coast we offer the following proposal for the park's consideration. Since the coastal strip is a relatively small protected area, the survival of wildlife and other biodiversity are potentially at risk because these areas could be too small to adequately support viable species populations and the ecosystem they need. Therefore, perhaps one management strategy would be to work with the US Forest Service and corporate timber managers to negotiate protected migratory corridors, for example, not generally not allowing general vehicle access, logging, or hunting within their boundaries, such that species are able to safely migrate unimpeded to and from park boundaries of the coast and those further inland. These migratory corridors could actually be relocated as needed through a flexible and adaptive approach that would allow timber managers to manage their resources for their purposes while at the same time meeting the resource protection mission and goals of the National Park Service.

Olympic Discovery Trail

Where the Olympic Discovery Trail enters existing park lands and potential new areas via the boundary adjustments, natural resource protections and enhancements we have already proposed for the Lake Crescent area, we simply propose, given surrounding impacts, that the resource conditions should aim at providing trail users with as much of a wilderness experience as possible where the trail enters north of the lake and then west along the shore.

Visitor Experiences

The “coastal wilderness policy” we already proposed above essentially considers what we would define as a high-quality visitor experience for hikers and overnight backpackers, however other primary questions in this area remain to be answered. Regarding increased visitation while maintaining quality visitor experiences and preserving resources for the Olympic Coastal Strip, we propose the NPS consider the current approach used by Parks Canada in Pacific Rim National Park along one 45-mile section of their coastal strip called the “West Coast Trail” (not to be confused with America’s 1,800-mile trail with the exact name.) The Parks Canada approach uses a quota system, an orientation session addressing issues such as minimum impact techniques, for example, the “tidal flush” method of disposing of solid human waste, and a reservation system during the peak season that allows one to reserve 2 months in advance. Ranger-led interpretive hikes about natural and cultural resources and history along the coast starting and ending at Rialto Beach, Kalaloch or Ozette could provide enhanced educational and recreational activities, protect resources and promote stewardship. Similarly, ranger-led interpretive canoe or kayak trips at Ozette and Lake Crescent could also be considered. Expanded interpretive signage relevant to the resources and history of a specific location both along the coast and in the Lake Crescent area, such as those in the Rialto Beach area, could also be developed in visually non-obtrusive spots along the Olympic Coastal Strip and the lake where hikers and backpackers and others would be able to easily view them. As already stated under “Wilderness” the primary facilities we propose for the coastal strip are ones for sanitation and emergency shelter within the park and along the trail.

Access along the Olympic Coastal Strip

A major logistical challenge for backpackers is transportation either to or from trailheads, and we propose the park partner with public bus transit systems to provide regular, safe, efficient and park-oriented visitor experiences for this recreation user from mid-June through mid-September. A model for this type of partnership is Lewis and Clark National Park with the Sunset Empire Transportation District to shuttle visitors between Fort Clatsop and the western trailhead of their Fort-to-Sea Trail (officially opened November 2005). Given the existence of the Clallam Transit System, Clallam Paratransit and Makah Public Transit, the National Park Service initiate discussion to potentially move to partnering with these public bus services to provide the access needed through transport for backpackers on a regular and timely basis along the Washington Coast Trail from Cape Flattery to the Queets River.

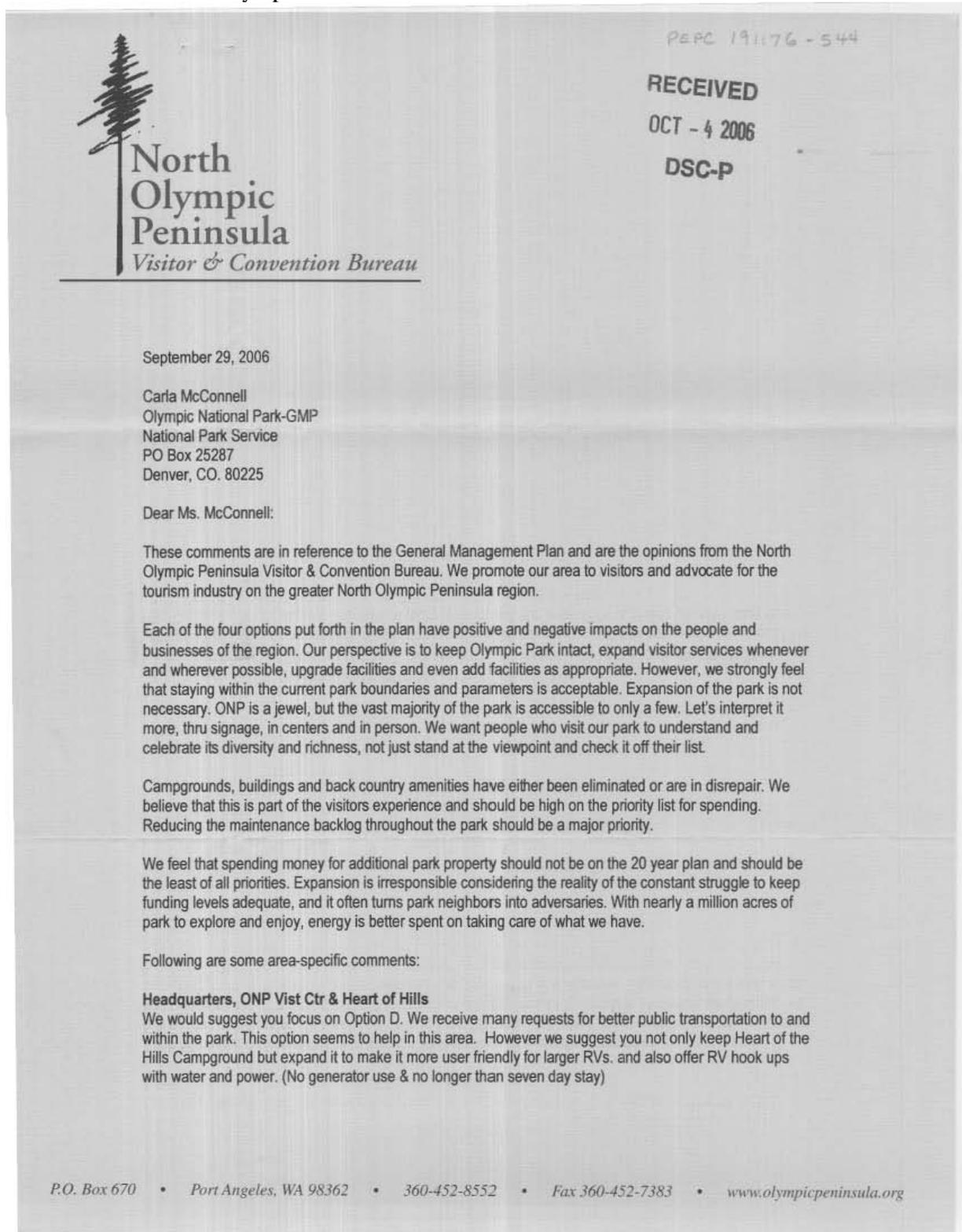
Specifically, starting at the northern terminus of the Washington Coast Trail at Cape Flattery, the Makah Public Transit could consider simply extend their service at least once each regular service day during peak season from their Tribal Center to both the Cape Flattery and Shi Shi Beach Trailheads. Clallam Transit already makes a connection with Makah Public Transit at once on regular service days, and this arrangement would thereby provide backpackers trailhead access on public transportation all the way from Port Angeles to either Cape Flattery or Shi Shi

Beach trailheads. The Clallam Transit System, perhaps in coordination with Paratransit Services, could offer daily shuttles with various buses potentially to and from Ozette, Rialto Beach, LaPush, Oil City, the south bank of the Hoh River, Ruby Beach, Kalaloch, South Campground and to the store just south of the Queets River Hwy 101 bridge, finally to return to Port Angeles at the end of the day's run. This would thereby provide backpackers with a public bus transportation system that would allow them to meet their logistical transportation needs to and from Port Angeles relative to various trailheads along the entire Olympic Coastal Strip and beyond plus connect with other services for transport to major cities such as Seattle, WA and Victoria, B.C. Since roads already exist to all the trailhead connections just specified, it would appear that impacts on natural processes and park resources would be minimal, if not negligible. Finally, we propose the park investigate the idea to potentially offer hikers and backpackers a boat transport service in compliance with US Coast Guard regulations with both the Quilleute and Hoh Tribes to cross rivers of the same name, respectively. If found viable and agreeable to the specific tribe, then we would propose the park facilitate the process towards implementing this water transport service.

We appreciate this opportunity to provide our comments.

Al LePage, Executive Director

Comment 544–North Olympic Peninsula Visitor and Convention Bureau



Hurricane Ridge & Obstruction Point

Having Hurricane Ridge is a universally popular tourist destination, one which is relatively easy for the motorized tourist to access and see the broad vistas of the Park. If the road were to be open more often and more consistently it would be a big plus to our business community. With that in mind we would like to see better snow removal for the ridge road with the opportunity for alternative transportation access. Also allow for significant upgrades of ski area facilities. Recommend putting ski area operations out to bid for a private developer and allow them to enlarge facility.

-We also encourage you to allow Hurricane Ridge Road to be used for Bicycle special events. This ride would be very popular as a hill climb, or part of an organized tour event. Putting a limit on the use to no more than three times per year would be acceptable.

Elwha

-This section is going to be going through major changes in the years to come, as the dams are removed. We like your approach to the growth with the comments in option D

Lake Crescent

-Improving the trail on the North shore of the lake is an important step. We need to have another option for cyclists and get them off 101. Of the options we agree most with option C. Lake Crescent is known as a unique tourism destination and better access would benefit the visitor. Improvement of facilities and the trail system is important, however we do not agree with increasing the boundaries of the park.

Sol Duc

-The Sol Duc area is very popular and definitely would be used more if it were open for a longer season. Therefore we agree with option C

Ozette

-We agree with option D but only with these adjustments:

*improve Ozette Campground to handle larger RVs with power and water. *Allow non-motorized and motorized boating.

However, we suggest that no wake zones be established to help separate the users, which would allow for a better experience for all, and promote safety.

*Park boundaries stay at current levels

Explore partnerships to acquire land easements to protect fisheries and the water quality of the lake

Mora

-We like Option C except we would like the Park to take it a step further. We encourage ONP to do a land swap to allow Quileute Tribe to have access to some higher land, and ONP have an official trailhead and defined access to second beach. This would make a much better trailhead and also allow the tribe to have a safe haven during severe storms.

Hoh

-We agree with the ideas proposed in option D

Kalaloch

-This area definitely needs upgrading. It has much more potential if the facilities were improved. Therefore we agree with option D

Queets

-We would like the Park to pursue option C.

Quinault

-The improved trail and biking opportunities in C would be very welcome. This option would increase the visitor access and make the area more of a destination. We encourage option C.

Staircase

-We agree with option C with the following suggestion.
-Access to the park would be improved for year-round use, if feasible, with the U. S. Forest Service.

We hope our comments will assist in you making decisions that will serve the public and the park for the next 20 years.

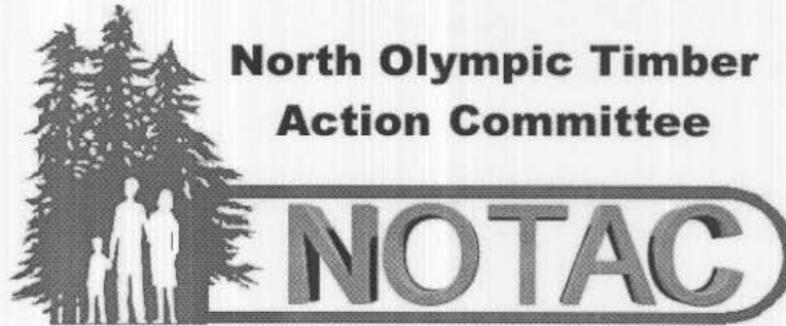
Sincerely,

A handwritten signature in cursive script, appearing to read "Diane Schostak".

Diane Schostak
Executive Director

Comment 445-North Olympic Timber Action Committee

PEPC 190943-445



National Park Service
Carla McConnell
Denver Service Center-Planning
PO Box 25287
Denver, CO. 80225

Re: Olympic National Park GMP

September 28th, 2006

To Whom It May Concern:

The North Olympic Timber Action Committee is a non profit, grassroots organization. We organized in Feb. 1989 to support laws, rules, and regulations which enhance commercial forest management. We also support a stable economy and a healthy balanced environment and we will oppose any effort to curtail or eliminate commercial forest activities.

We cannot begin to express our disappointment in the quality of the draft management plan. It appears to have been poorly researched and hastily written! This GMP draft is an unbelievable waste of taxpayer money. It is grossly lacking in economic data and understanding of the contributions of the forest industry to the Olympic Peninsula and specifically Clallam County.

We oppose any expansion of the boundary line for the Olympic National Park under any alternative mentioned in the draft or developed in the final plan. There are a number of reasons for this statement:

Approximately 90% of the land base within Clallam County is owned by State or Federal Agencies and Tribes. The County Treasurer receives only 21 cents an

acre for 518,812 Federal acres within our County. Payments in Lieu of Taxes (PILTS) are in danger of being eliminated by Congress in the next few years. The citizens of the US by default transfer the tax burden of these Federal lands to the citizens of Clallam County. We do not want or need productive timberland converted to more Federal Land!

The Olympic National Park has decreased its' contribution to family wage jobs impacting the local economy due to your own budget cuts (see note 1 on pg 64) and the corresponding cuts in tourist experience, closures or curtailed programs in campgrounds, backcountry trails, shelters and bridges/roads closed or curtailed due to lack of maintenance. There are huge maintenance backlogs of Park facilities, roads and, bridges affecting the visitor experience and local residents. It is difficult to understand why Olympic National Park needs to expand boundaries when they cannot properly take care of what they have already!

Land Protection/Boundary Adjustments (Pg. 64) are not realistic land acquisition figures and are a good example of how out of touch the writers are with our region and the value of timberland.

The timber industry has spent years supporting rules and regulations to meet the Federal laws for clean air, water and endangered species so there could be some certainty to continue forest management practices and timber harvest. We believe that Washington forests meet the strictest land regulations in the world. If Park boundaries are expanded, another layer of restrictions are added to forest practice applications for forest landowners (Class IV-special) and will make it more difficult and less economic to manage forestlands. Next comes the reduction in property values due to excessive regulations and the Park can take advantage of the "willing seller" at a discounted price.

The draft plan mentions Forest Stewardship Certification management for lands that would be acquired for Washington Department of Natural Resource from privately owned timberland that ONP would hope to buy and trade for scattered mineral rights held by the DNR. The DNR has a constitutional mandate to manage their assets to produce income for various trust beneficiaries. The Park has no business mentioning DNR management practices in this draft plan. (pg. 35)

The economic analysis is vague and incomplete. (pages 162-174) There is no mention of the importance of the family wage jobs contributed by the timber and manufacturing sectors pg. 167) under major industries. Your employment data (table 18) is from 1999. In the past 2 years the forest products sector has invested \$50 million dollars in new manufacturing facilities, creating over 150 direct family wage jobs with benefits in Port Angeles alone. This does not include additional logging and trucking jobs plus the jobs created from having a healthy economy. The Shelton area has also had facilities improvements and job additions matching those in Clallam County. Your draft does not

reflect current economic data and the data you have is poorly written. The Washington Forest Protection Association has substantial data on the economic contributions of the forest products industry to the State of Washington. The Clallam County Economic Development Council could also have provided you with more updated and accurate employment information.

Page 313 contains a number of dramatic statements:

1. "Human activities are producing global climate changes." There are many opposing scientific views on this topic. What source did you use to justify making this statement?
2. "Slope failures and increased sediment delivery on private lands associated with roads and timber harvest can adversely affect hydrologic resources. Timber harvesting and road building have substantially affected slope stability and fluvial erosion on lands adjacent to the Park. Increased sediment delivery to streams has changed streams channels and aquatic habitat and also affected coastal ecosystems." Are you making these comments based on past or current conditions? In the past 20 years the forest industry has been very proactive in addressing problems associated with timber harvest and building forest roads. Forest and Fish Rules, Road Maintenance & Abandonment Plans, and Habitat Conservation Plans have focused on fish habitat and water quality improvements. It appears your draft was written about the past and not the present.

Overall we find it disappointing, that the draft plan seems to place undue blame on the timber industry for water quality issues. Our industry has spent more money and set aside more habitat and riparian areas than any other business or private sector landowner. Science is proving that active management can create desired conditions faster than the natural process.

The North Olympic Timber Action Committee believes that the Olympic National Park is a huge asset to our region. Private timberland is a part of the tourism experience too. Private timberland is available for hunting, fishing, hiking, mountain biking, berry & mushroom picking and horseback riding. Peninsula residents and tourists take advantage of the many recreational opportunities provided within the ONP and private lands. The Park has dramatically decreased its' services over the past several decades due to budget cuts. That brings up the question why the ONP finds it necessary to expand its' boundaries when it does not have a budget to take care of the current assets?

The peak tourist season provides seasonal jobs and is an economic boost to the retail and service sectors in our region but the visitor numbers have been declining. The draft management plan does not explain why the visitor count is declining or how a Park boundary expansion would increase visitor numbers? Please provide us with your analysis of how Park expansion will benefit the tourist economy and justify that benefit against the loss of family wage jobs from the timber industry!

The North Olympic Timber Action Committee is firm in our comments and convictions! We do not support any boundary expansion of Olympic National Park! It appears the park is following its' historic pattern of expanding simply for the sake of expansion. The ONP should draft a plan that addresses the current backlog of maintenance and repairs. It should develop a marketing strategy to improve the visitor experience which would include improved facilities, automated or interactive educational programs for remote sites and campgrounds, improve existing visitor information centers with automated information and quality printed material. GETTING BIGGER DOES NOT MEAN GETTING BETTER!

We cannot begin to express the disappointment in the quality of the draft management plan. It is full of old or outdated data, and appears to have been hastily written and poorly researched. No private business or industry would plan a future management direction the way this draft plan was written.

On February 23, 2006 the U.S. House of Representative, Committee on Resources, stated that "The committee believes that the NPS budget must reflect the following priorities: enhancing the visitor experience, increasing access and reducing the maintenance backlog." (copy enclosed) Olympic National Park should follow that recommendation!

Respectfully,



Carol Johnson
Executive Director
NOTAC

Comment 370-Olympic Coast Alliance



Olympic Coast Alliance

PEPC 190852 D
-370

RECEIVED

OCT 27 2006

DSC-P

September 27, 2006
Olympic National Park Draft GMP
Denver Service Center
P.O. Box 25287
Denver, CO 80225
olym_gmp@nps.gov

To: Park Planners

The mission of the Olympic Coast Alliance is to assure a healthy coastal ecosystem through public education, conservation advocacy, and particularly to support the integrity of the Olympic Coast National Marine Sanctuary. The planning alternatives include many positive aspects, and show deference to our concern for the appropriate management of intertidal zones, river protection, and the use of land immediately adjacent to, and upstream of critical salmon habitat.

We would like to see the park strengthen protection of rivers by recommending Wild and Scenic river designation where appropriate. These rivers are crucial to protection and recovery of Washington State's endangered salmon runs. We must do everything in our power to protect this habitat and minimize harmful actions.

For these reasons we suggest that developed areas and zones in the park are not expanded. Future developments, commercial and recreational, should be located off National Park managed land. This is an environment that is already coping with human impact. Rather, we suggest that the park keep these areas undeveloped and expand its boundaries to include watersheds within the areas of Lake Crescent, Lake Ozette, and the river systems of the Hoh, Queets and Quinault.

The completion of a long overdue comprehensive wilderness plan would be very helpful in addressing our goals. We strongly support the designation of intertidal reserves. In addition we suggest that there be recognized high use areas to contain human impacts to small areas of the fragile intertidal zone. Frequent human presence can have negative impacts on the productivity and biodiversity of these areas.

The recommendation of a wilderness study for Lake Ozette and the designation of intertidal reserves show your dedication to managing these sensitive lands positively. We applaud you for this and urge you to continue positive management of this remarkable park. Thank you for this opportunity to comment.

A handwritten signature in black ink, appearing to read "Jennifer Mapes".

Jennifer Mapes
Olympic Coast Alliance

www.olympiccoast.org

OCA@olympiccoast.org

P.O. Box 573, Olympia, WA 98507-0573

(206) 364-3933

Comment 317-Olympic Environmental Council

PEPC 190794-317



Darlene Schanfeld
<darlenes@olympus.net>
t>
09/20/2006 09:25 AM
MST

To: olym_gmp@nps.gov
cc: darlenes@olympus.net
Subject: ONP comments on GMP/EIS

Cliff Hawkes
Olympic National Park General Management Plan
National Park Service
Denver Service Center
P.O. Box 25287
Denver CO 80225
olymp_gmp@nps.gov

RE: Olympic National Park Draft General Management Plan/Environmental Impact Statement (Draft GMP/EIS)

(Please confirm receipt of these comments.)

The Olympic Environmental Council is a 501(c)(3) organization based on the North Olympic Peninsula of WA State founded in 1990. Our primary involvement is in Clallam and Jefferson Counties.

A main concern of ours is the portion of the Olympic Discovery Trail (ODT) which will run through the ONP on the north side of Lake Crescent through wooded areas and along the lake's waterfront. (Pages M13-16). The trail runs between East Beach Road and the Fairholme Campground. It is now an existing trail. It is referred to as the Spruce Trail.

Most likely your Alternative D, point 6 addresses this: "...A universally accessible front country trail would be developed and maintained." We believe this has already been decided.

Our concerns are the following. First, while we support keeping the trail, we do not support paving it. Paving portions of the Olympic Discovery Trail in Clallam County has a toxic history. Once the trail is paved, weeds will collect through and around the pavement. The maintainers of the trail, likely the ODT volunteers, will want these weeds removed. To date the ODT volunteers have turned to introducing herbicides rather than pulling or another method for weed removal. This has contaminated long sections of the trail in Clallam County and has put in harms way the trail users and the wildlife.

Here, at Crescent Lake, the herbicide will be transported into Lake Crescent with wind, rain and fog.

And it will contaminate the trail users and the horses on the parallel trail (assuming a horse trail will be cleared), as well as the land and water local wildlife.

We understand the need to give bikers a route off of Highway 101. The trail is an acceptable alternative. But paving it creates a biker's trail and not a trail for the public at large; not for joggers or walkers who want ground to walk on, not the main users to date, and not the majority of future users.

Second, we are concerned about the increase of human traffic on this trail. This is cougar territory, especially in dry weather. There have been several incidents between panther and humans over the years, including with bikers and joggers. Increase in human traffic means more invasion into this cat's natural territory. How will the cougars be protected and how will the humans be protected? What safety plans have been drawn up? When will the public have a look at these plans?

We oppose paving and, if paving is approved, non toxic methods (and these are available) must be implemented for weed control, perhaps through the use of a steam method. More health and environment harm will come from the use of herbicides than from keeping "front country" bikers on Hwy 101. Too, while this trail invites biker use increase, if herbicides are used anywhere near it, then other citizens -- chemically sensitive and those that want chemical free recreation -- will be unable to use the trail. This is no gain.

In addition to this trail, we regard that first and foremost, protection of the Park's natural resources and permanent residents -- the wildlife, flora and fauna -- be of primary concern and protection. An ecosystem study should be undertaken to provide necessary groundwork for long-term decision making.

We support the expansion of park boundaries in five critical areas (Lake Crescent and Ozette Lake, and Hoh, Queets, and Quinault watersheds) in a manner that conforms with watershed basins to help recovering salmon populations and downstream fish species from destructive upstream timber harvest and road building, and to help protect critical elk habitat. The Park Service should perform Wild and Scenic River eligibility studies for all of the rivers in Olympic National Park, and ensure that the management plan protects endangered salmon.

We support intertidal preserves established on the park's wilderness coast to protect biologically rich marine areas.

We support "river protection zones" to maintain the natural functions of coastal rivers and to keep wild salmon populations intact.

And we support the reintroduction of extirpated species, like the wolf and fisher, to complete a nearly intact ecosystem.

We support the use of mass transit opportunities to the most used park entrance sites which host interpretive, camping and hiking opportunities. This could be done through a contract with the local bus companies in each county. The buses should be retrofitted with the least polluting

technology. Mass transit, hopefully, would reduce the number of autos entering at each point, hence would diminish auto exhaust. It could also be a way to control the visitor number in a park region at any one time.

But road access in the park, including flood plains, should not be allowed where they can impact salmon habitat and the natural river process. Wilderness boundaries should not be moved on active flood plains to maintain problem roads.

We agree there should be a wilderness suitability study for Lake Ozette and that Wild and Scenic River designation is appropriate for the Elwha River. Are there other rivers that should be eligible for the Wild and Scenic River status?

To help reduce air pollution, camp fires should be discouraged.

Expansion of educational and interpretive programs is a good idea. However, we do not support increasing infrastructure foot prints.

Please do not expand development zones from their current size. The Sol Duc campground, for instance, should not be expanded from 82 campsites to 250, or anywhere near this number.

We do not favor expansion of commercial concessions within the park. Rather, we support local businesses having this business. The Hurricane Ridge Visitor Center (HRVC) should not be expanded. The food service there should either be eliminated or replaced with one that offers healthy menu. Fatty food and food with little nutritional value should not be allowed in our national parks, even more so since the U.S. claims to want to eliminate obesity and foods which elevate this. In fact, we don't need a food service at the HRVC. The public should be encouraged to bring their own food or support the local eateries. Doing away with this HRVC service would decrease trash and water and electricity costs.

In park areas that are quite a distance from community resources and maintain food services, these service areas should maintain their present foot print and should provide healthy food choices; again, not foods that push obesity, heart attacks, strokes, diabetes, etc.. A positive example is the present service at Lake Crescent Lodge.

The plan overemphasizes historic preservation at the expense of natural resource and wilderness protection. This point of view should be reversed.

At this juncture in time, a wilderness management plan should be completed before wilderness decisions are made.

Respectfully submitted,

--

Darlene Schanfald, Secretary
Olympic Environmental Council
PO Box 1906
Port Townsend WA 98368

Comment 292-Olympic Forest Coalition



Olympic
Forest
Coalition

Protecting and restoring our Olympic forest and aquatic ecosystems

190370-292
RECEIVED

AUG 07 2006

DSC-P

July 26, 2006

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

To whom it may concern:

The mission of Olympic Forest Coalition (OFCO), incorporated as a non-profit in 2002, is to protect and restore the forested and aquatic ecosystems on the public lands of the Olympic Peninsula. As such, we have great interest in the revision of Olympic National Park's General Management Plan. We believe strongly that an adequate GMP will prioritize conservation of the park's natural resources (both within and outside designated Wilderness boundaries), avoid all development that would compromise the integrity of these ecosystems, and actively seek out strategies to restore the park to pre-settlement conditions to the furthest extent possible.

In this respect, we are highly in favor of expanding the park boundaries at Lake Crescent, Lake Ozette, and the Queets River, though the Park Service's preferred alternative (D) is overly modest in this context. Specifically, the proposed boundary adjustments do not adhere to logical watershed boundaries and are insufficient to protect fish species in the lower portions of the drainages in question from logging and roading activities upstream. We recommend enlarging these proposed boundary adjustments to conform with the landscape's hydrologic boundaries, while including additional enlargement of park acreage in the Hoh (inclusion of the South Fork's drainage is especially critical and desirable) and Quinault watersheds, as recommended in Alternative B.

Similarly, we strongly support the establishment of marine intertidal reserves along sensitive areas of the park's coastal strip, motorized boat restrictions and a Wilderness suitability study for the Lake Ozette area, proposed Wild & Scenic designation for the Elwha River, expanding educational programs for visitors across the park, and encouraging mass transit alternatives in developed portions of the park.

OFCO has, however, a number of serious concerns about the preferred alternative. The Park Service's continued devotion to its road system, including those roads within floodplains and with significantly harmful impacts to anadromous fish species, is indefensible. This shortcoming is worsened by the denial of "river protection zone" status to the major streams of the park, which provide critical habitat for ESA-listed salmonids. Moreover, we oppose movement of 1988 Wilderness boundaries for relocation of problem roads - which should in fact be decommissioned. Given the Park Service's mandate to conserve the public's resources on lands the agency manages, perpetuity of the road system must be made subordinant to adjacent natural, native features (both terrestrial and aquatic). The North Shore Road situation at Finley Creek is a particularly regrettable example of

7954 Pleasant Lane NE #3, Bainbridge Island, WA 98110 • (206) 780-2254
www.olympicforest.org • jims@olympicforest.org

the need for more enlightened road management.

Alternative D's partiality towards developed recreation and motorized access, at the expense of natural resource protection and species restoration, is also quite troubling. We are very much opposed to proposals to expand development zones from their current size; as evidenced, for example, by consideration of expanding the Sol Duc Campground from 82 to 250 units (the equivalent of making way for a virtual, transient city in the summer months in an otherwise primitive and especially scenic valley). Proposed expansion of commercial concessions yields similar worries, suggesting the likelihood of increased and inappropriate "Disneyfication" of this Biosphere Reserve and World Heritage Site.

It is upsetting, as well, that the Park Service did not pursue a needed ecosystem study to inform longer-term decisions, offered no Wild & Scenic River eligibility study for the dozen rivers which would likely qualify (presumably because it would complicate the agency's bias toward road permanence and/or reconstruction in floodplains), overemphasized preservation of semi-historic structures at the expense of Wilderness protection, and once again shortchanged Olympic by failing to complete a timely Wilderness Management Plan.

Lastly, OFCO's board and membership are unabashed advocates of reintroducing previously extirpated species to the park – particularly the gray wolf. There is no excuse for the Park Service to attempt avoiding a decision on wolf reintroduction in the GMP. You will of course note that a favorable federal government study of this issue is already available. It is the agency's clear, legal responsibility to manage the park in such a manner as to maintain its existing natural attributes, as well as to restore those attributes which have been lost through past mismanagement. We cannot urge strongly enough that the Park Service meet its obligations to the public by endorsing and preparing for necessary wolf reintroduction in the near future. Similar urgency is warranted for planned reintroduction of the Pacific fisher.

Alternative D's timidity, lack of commitment to Olympic's natural resources and ecosystems, and avoidance of several substantial and pressing issues require significant attention on the part of the Park Service. In the final EIS, we look forward to having these concerns better addressed. Thank you.

Regards,



Jim Scarborough
OFCO Board of Directors

Comment 321-Olympic Park Associates

OLYMPIC PARK ASSOCIATES
12730 Ninth Avenue, N.W.
Seattle, WA 98177-4306

REC 190798-321
RECEIVED
OCT - 4 2006
DSC-P

September 14, 2006

Carla McConnell
Olympic National park GMP
NPS Denver Service Center - Planning
P.O. Box 25287
Denver, CO 80025

Re: Olympic National Park General Management Plan DEIS

Olympic Park Associates appreciate this opportunity to comment on Olympic's Draft General Management Plan (GMP). We offer these comments in the sincere hope that they will lead to a sound plan and a positive future for this magnificent, world-renowned natural preserve.

As we stated in our scoping comments in 2001, we of OPA share a vision for the park that would protect and restore the outstanding natural and wilderness qualities for which Olympic National Park was established. These qualities are articulated in U.S. House of Representatives, House Report 2247, April 28, 1938 that accompanied creation of the park.

"... preserve for the benefit, use and enjoyment of the people the finest sample of primeval forests ... winter range and permanent protection for the herds of native Roosevelt elk and other wildlife indigenous to the area ... conserve and render available to the people, for recreational use, this outstanding mountainous country ... and a portion of surrounding verdant forest together with a narrow strip along the beautiful Washington coast."

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. Human use would be managed to insure enjoyment of the park while protecting the healthy functioning of its ecosystems into the future. We believe, given the park's legal mandates and agency policies, that this should be your goal as well.

As you know, much has changed since the park was established in 1938 -- or since the last management plan was completed in 1976. Olympic is no longer surrounded by vast areas of undisturbed forest. Roads, logging, and residential development of forest lands now define much of the park boundary. Increased recreational use of all types place demands on resources. Cumulative impacts on lower rivers and salmon streams and illegal hunting pressures have impacted park wildlife, fragmented habitats, and impaired ecosystem functions. Visitation to the park is increasing dramatically (doubling since the 1976 master plan). Added to this, climate change is already affecting hydrologic regimes and natural processes in the park and threatens to have major impacts on wildlife habitats from river systems to subalpine meadows.

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. We feel the preferred alternative in the current draft falls woefully short.

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

We support the park's intent to recommend boundary expansions to protect habitats for threatened and at-risk wildlife populations. As you know, it will be up to Congress to legislate any additions to the park. We urge you to take a broad, long-term perspective on these recommendations and let the political process do the compromising.

We strongly support 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. We support 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.

We support the Kalaloch Lodge, facilities, and highway relocation. And we support the park's intent to expand educational and interpretive programs, develop short interpretive trails, and encourage mass-transit in high-use areas. We request a shuttle be required on the Obstruction Point road during peak season to alleviate constant clouds of dust, parking overflow, and engine compartment temptations to marmots.

All of these recommendation make a good start toward a GMP worthy of a World Heritage Site and international biosphere reserve.

On the whole, however, we find the preferred alternative of the draft GMP to be lacking in the critical qualities mentioned above: boldness, vision, 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.

Specifically, the preferred alternative (D):

- * offers inadequate measures for recovering threatened and endangered or at-risk wildlife species
- * offers boundary expansions that fail to conform to watershed and topographic features, and are inadequate to protect and restore target wildlife populations
- * fails to protect irreplaceable habitats such as low-elevation and floodplain forests, and offers inadequate protection for rivers, riparian areas, and critical salmon habitats
- * inordinately expands front country development zones far beyond current uses or any reasonable future use
- * favors roads and motorized access at the expense of fish and wildlife habitats
- * is overzealous in approach to cultural resource protection throughout the park, and
- * threatens the integrity of the Olympic Wilderness.

Further, we feel the draft plan misses 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, outlined in our 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 into the Olympic National Park
- * 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.

We will address these and other issues under some general headings. We will supply rationale where appropriate and recommend changes in the draft that may improve prospects for sound ecosystem management.

Wilderness

The discussion of desired conditions for wilderness in chapter 1 (p. 26) is flawed. The interpretation of "lower standards" as displayed in your matrix has been refuted by two recent U.S. federal court decisions, including *Olympic Park Associates v. Mainella* (2005). In that decision Judge Burgess found NPS managers guilty of "a clear error of judgment" in their interpretation of historic preservation in wilderness. The lower standards clause in no way gives priority to the National Historic Preservation Act or DOI or NPS administrative policies. Wilderness designation places "a new value" on the land, in Judge Burgess' words, i.e. a clear mandate to preserve wilderness character.

The plan states the NPS will maintain all existing and potential national register properties in wilderness. Appendix E lists "classified structures," to be maintained. Twenty-nine (by our count) are located in wilderness. This list includes at least one structure no longer standing. Another 21 are to be evaluated, "properties" that include some weathered piles of logs, an obsolete research facility, and a sawmill ruin. We have little doubt that all of these will make the cut.

For the GMP to decree that some fifty structures and eight "historic landscapes" (including the "USFS trail system") will be maintained in wilderness in a forthcoming wilderness management plan -- without addressing necessity under the Wilderness Act or their impacts on wilderness character -- is contrary to the Wilderness Act, NPS wilderness policies, and the scope of this plan.

Similarly, to zone the Olympic Wilderness into use zones, including some 500 miles of trails, campgrounds, primitive trails, and cross-county routes without providing any detail or specific rationale for is clearly beyond the scope of the present plan. We prefer the wilderness uses sketched in alternative B, but we are unable to comment on your alternatives for wilderness zoning due to the plan's lack of specific reference or rationale for these designations.

The GMP seems to be attempting to make up for the park's lack of wilderness management plan by front-loading several controversial decisions -- decisions that deserve full discussion of rationale and impacts -- in the current plan. This shorthand planning process shortchanges wilderness management and does a disservice to your wilderness planning effort. It will not meet a legal challenge.

The GMP should direct the park to produce a wilderness plan that will guide management under the clear mandates of the Wilderness Act. If specific wilderness decisions are to be put forth in this plan, then a complete discussion of their legality

under the Wilderness Act and impacts on wilderness character must be fully explored. Information on which the public can assess decisions affecting wilderness is nonexistent in the current draft GMP.

Rivers

With the increased frequency of flooding and resulting road washouts experienced by the park and national forest in recent years (possibly linked to global warming's effect on rain and snowfall regimes), river and road management deserve careful planning.

The park's rivers provide habitat for 70 stocks of salmonids, a number of which are in decline and considered at risk by fishery managers (1992 Washington State Salmon and Steelhead Stock Inventory), as well as critical habitat for several special status fish.

With salmon declines regionwide, rivers should be afforded the highest levels of protection. We urge you to reconsider your river protection zones (offered in Alternative B). Mitigative measures for all alternatives quoted on p. 76 include "Delineate 100-year floodplains and minimize development in these zones." This directive would seem to require that the river zone concept be incorporated into the preferred alternative. It is the only measure in the GMP that offers adequate protection for fish habitat and naturally sustainable river ecosystems, restricts bank armoring, and protects the fisheries resource "unimpaired for the enjoyment of future generations." We also ask that you review river reach analyses (done for several west end rivers) to identify future trouble spots in advance of flood events and plan road and transportation systems accordingly.

The plan's assurance in the preferred alternative that roads will be maintained "using methods that minimize adverse effects on river processes and aquatic and riparian habitats, to the extent possible" fails to convince. In light of the recent rock armoring of the Sol Duc River Road without habitat mitigations, the park's insistence on reconstructing the Dosewallips Road regardless of impacts on critical habitat for federally listed threatened Puget Sound chinook, and the GMP's decision to continue destructive channelization of Finley Creek indefinitely, we have little confidence that future road reconstruction will be any different without strong protective measures made explicit in this plan.

At the very least, we urge you to include language in your preferred alternative that will restore some of the protections offered by the river zones: "Prime fish and wildlife habitat will be protected in naturally sustainable river ecosystems" (p. 57). "Natural resources may be minimally but not permanently modified for access purposes" (p. 57). "River bank or meanders would not be hardened or altered. Natural flooding and hydrologic processes would be allowed to occur" (p. 57). And "The riparian and floodplain habitats of rivers, streams, and estuaries would be protected" (p. 58).

Salmon habitats have been and continue to be impaired by the park's road program. The GMP planning process offers the possibility to reevaluate in light of current scientific findings and change course. We are dismayed that the preferred alternative's emphasis on maintaining road access takes precedence over protecting one of the park's most threatened and irreplaceable resources, its diversity of wild salmon stocks.

We object to the draft's decision to continue the annual bulldozing of the Finley Creek channel. The Finley Creek situation would be aided by bridge removal and summer grading of the stream crossing during the dry season, as considered in an earlier EA. Again, the draft plan front-loads a future planning effort with an unfortunate and short-sighted decision. The current situation is harmful and unsustainable. Eventually, natural stream dynamics should be restored in this area.

Wild and Scenic Rivers

In our scoping comments OPA requested that park rivers be evaluated for eligibility for inclusion in the national Wild and Scenic Rivers System, and that the GMP make recommendations to Congress. The Wild and Scenic Rivers Act requires federal agencies to study rivers for eligibility in their planning efforts. NPS management policies also require this (Section 2.3.1.10). We support the GMP's recommendation for the Elwha, but we are at a loss as to why the other eligible park rivers were not studied or considered.

The 1990 Olympic Forest Plan evaluated rivers for eligibility and made recommendations on rivers primarily in their jurisdiction. The forest service deferred to the park recommendations for rivers that were predominantly in the park's jurisdiction. We believe those evaluations are available for review and urge park planners to review them. We also request the Queets and other park rivers not reviewed by the forest service be evaluated in the final plan.

The Wild and Scenic Rivers Act was passed in 1968. Olympic National Forest published its recommendations in 1990. The park service has had ample time to review the exceptional wild and free-flowing rivers in its jurisdiction and make recommendations to Congress. If the final GMP must be delayed to complete this obligation, it will be worth the effort.

Boundary adjustments

We commend the park service for planning for the future by recommending land additions in critical habitat areas to help protect wildlife species. We realize that these are controversial recommendations on the local level, but given impacts to park wildlife from destructive activities outside the park, we recognize that boundary adjustments are often the only way to insure permanent habitat protection.

The boundary adjustments offered in Alternative B appear to be informed by wildlife science, and we support them in every sense. Park managers should keep in mind that these are agency recommendations. Final boundary adjustments will result from congressional action and the political give-and-take that accompanies that process. Park recommendations should be sufficient to accomplish the objective of wildlife protection and ecosystem restoration.

Ozette Lake. The proposed boundary expansions for Ozette Lake in alternative B follow the hydrographic divide of tributaries making up the Ozette Lake watershed. The wisdom of including the entire watershed within the park allows restoration and planning activities to be determined by a single agency – one dedicated to protecting natural systems. By removing abusive (albeit legal) logging practices that have resulted in siltation to the lake and its tributaries and harm to its threatened sockeye population, the advantage to the recovery process for Ozette Lake sockeye would be enormous. It would take years, possibly decades for the land to be acquired on a willing seller basis and restored to natural conditions. But the last wilderness coastal lake in the world would be fully protected, and park planners would have room to manage adequately for future uses.

The addition recommended in the preferred alternative fails to address the impacts of industrial logging on the Ozette watershed. While an improvement over current boundaries, proposed boundaries do not make sense ecologically, and by allowing continued logging abuses in the basin, they offer little hope for ecosystem restoration for the Ozette watershed.

We cannot endorse the proposed land acquisition and exchange with Washington's Department of Natural Resources. More details would be needed to fully evaluate this proposal, but turning federally purchased land over to the kind of maximum timber harvest practiced by the DNR without the minimum ecological protections assured by Forest Stewardship Council (FSC) certification is self-defeating. The timber-industry certification offered represents the same kind of abusive forest practices that condemned the Ozette sockeye to the endangered species list in the first place. It is disturbing that the National Park Service is advocating such a measure.

Lake Crescent. The fortunes of the Cresceni and Beardslee trout of Lake Crescent have been dire in recent years. Both populations declined markedly during the 1990s with Beardslee numbers dropping below 100 in 2000. Major impacts to both fish's spawning areas in the Lyre River occurred when a 1997 slope failure resulting from logging steep unstable ground in the Boundary Creek drainage sent thousands of tons of sediment into Boundary Creek and the Lyre River drainages.

Expanding the park boundary north at Lake Crescent to include critical spawning reaches of the Lyre River and all of the Boundary Creek drainage (as recommended in Alternative B) would ensure that critical spawning habitat for these fish would be protected. Most of Boundary Creek is already in federal (forest service) ownership. Additional private acquisitions beyond the preferred alternative would be modest.

By offering inadequate protection for the Boundary Creek watershed, the preferred alternative opens the door to further impacts of Lyre River spawning areas. With the reduced Beardslee and Cresceni numbers of recent years, this does not insure the future of these unique fish.

Quinault. The modest adjustment of the south boundary to include the rivers floodway would be an improvement, insuring comprehensive management of the river zone. We're aware, however, that prospects for armed insurrection in the area must be taken into account.

Queets and Hoh. We endorse the inclusion of the northern drainage of the lower Queets River within the park as proposed in Alternative B, to protect important seasonal habitat for Roosevelt elk and coho salmon habitat. The addition would afford much more protection for the compromised Queets corridor, and more than the modest boundary adjustment offered in the preferred alternative.

The South Fork Hoh River. Wouldn't that be nice.

Developed areas

The development zone standards and the size of development zones in the preferred alternative are entirely out of scale for a wilderness park like Olympic. Descriptions of development zones should be scaled down to comply with current uses at Olympic, and development zones should be expanded only when there is no other way to accommodate necessary visitor services outside the park.

Development zones in Olympic should accommodate campgrounds of no more than 100 sites (200 for Kalaloch). The 250 campsite figure (which more than triples the size of some of your largest campgrounds) is wildly out of scale with current and projected needs at Olympic. Campground expansion, where it occurs, should emphasize tent and small vehicle camping, leaving the accommodation of large, self-contained recreational vehicles to commercial facilities outside the park. It is unwise to sacrifice low-elevation, floodplain and old-growth forests, where most campgrounds are sited, in order to accommodate large, polluting, noise-generating RVs.

The preferred alternative's dramatic expansions of developed zones at Elwha (two miles along the Elwha River Road and a mile of Lake Mills shoreline), Sol Duc (one-half mile of floodplain west-northwest of the resort), and Hoh (approximately 300 acres of old-growth temperate rainforest north of the visitor center) are both worrisome and baffling. No justification for this level of increased development is offered in the draft, or any indication of the types of development (existing services or new

commercial development) is given. Further, no acreages for these zones are provided, thus limiting the public's ability to evaluate these proposals. A simple table comparing acreages for these zones for the various alternatives would be extremely helpful.

These zone expansions represent a radical departure from existing uses and a level of future development inappropriate for a natural preserve like Olympic. As we suggested in our scoping letter, development on this scale should be located outside the park where local communities can reap the economic benefits of providing visitor services.

Proposed development expansion in the Elwha is particularly troubling given the effort and expense being undertaken for dam removal and ecosystem restoration. One of the conditions that helped drive the restoration was the pristine nature of the watershed inside the park. With dam removal imminent, is this the time to alter the natural conditions of the watershed with miles of expanded development zone for the Elwha? We think not.

We commend the park on its decision to remove the Kalaloch development away from the coastal area. We urge moderation in planning replacement facilities.

Extirpated species

Restoring extirpated species should be a high priority for the park. We suggest that "Reintroduce extirpated special status species" be added to mitigative measures on p. 77, and that the restoration of extirpated species become a desired condition for the future of the park. We appreciate the park's cooperation with Washington Department of Fish and Wildlife's effort to restore fisher to Olympic National Park. It would be appropriate for the GMP to give guidance and approval to this restoration.

Similarly, a good case has been made for wolf reintroduction at Olympic. The U.S. Fish and Wildlife Service's 1999 feasibility study for wolf reintroduction found that there was sufficient prey and habitat to support a population of some 50-plus wolves in the Olympics. An earlier survey by Defenders of Wildlife found the idea was popular on and off the peninsula.

The experience at Yellowstone has demonstrated the tremendous power of ecosystem revitalization brought about by wolf reintroduction. The same could be true for Olympic, particularly regarding coyote population control and reducing coyote predation on declining marmot populations. In time, wolf reintroduction could stand beside Elwha River ecosystem restoration as the capstone of a revitalized ecosystem. We request the GMP provide guidance that wolf restoration be a desired natural resource condition and recommend reintroduction.

Non-native species

The park's draft environmental impact statement on non-native mountain goats has been in limbo for more than a decade. Our members have reported increasing numbers of goats in many areas of the park, obvious goat damage to plant communities and have witnessed goat-human interactions at several locations. In short, the goat problem is once more rearing its horny head.

We understand your reticence to offer management direction for goats in this document. But your discussion of nonnative species (p. 111-112) is wholly lacking in direction for any nonnative wildlife. The park has a recognized mandate to manage nonnative populations and where appropriate, remove them. This issue requires a much fuller discussion in the Final EIS.

Conclusion

While the DEIS offers considerable discussion of balancing resource needs with human use, we find the plan is distinctly out of balance. The preferred alternative displays a pronounced bias toward motorized access, increased development, and a preoccupation with cultural resource protection. On nearly every critical issue, natural resource protection is compromised to accommodate the above uses. Habitat needs of special status species are too-often ignored, and wilderness protection is compromised by peremptory management decisions.

An example of this bias is evident in development zones. Nearly all the expanded development zones in alternative C (visitor opportunities emphasis) have been included in your preferred alternative (Hoh is much larger in the preferred, though Kalaloch is slightly smaller). In contrast very few of the natural resource protections offered in alternative B appear in the preferred unaltered. Ecological boundary adjustments, river zone, and "primeval" wilderness zone have been compromised or dropped. At the same time, radical cultural resource protections (blanket preservations of "classified" lists of structures and landscapes) are treated as sacrosanct.

Similarly, we find the draft's analysis of impacts of the preferred alternative inadequate and lacking in clarity. Language such as found in your conclusion of impacts on hydrologic systems, "Implementing alternative D would have a long-term moderate beneficial effects and long-term minor to moderate adverse effects on hydrologic systems" (p. 315) is not useful.

Sincerely,



Donna Osseward,
President, Olympic Park Associates

cc: Regional Director Jon Jarvis
U.S. Congressman Norm Dicks
U.S. Senator Maria Cantwell
U.S. Senator Patty Murray

Comment 203-Olympic Peninsula Audubon Society

PEPC 190549-203



Olympic Peninsula Audubon Society
P.O. Box 502, Sequim, WA 98382
www.olympicpeninsulaudubon.org
Representing more than 550 Clallam County Members

Promoting Birding and Conservation as Community Educators, Volunteers, and Stewards

September 7, 2006

Olympic National Park General Management Plan
National Park Service
Denver Service Center—Cliff Hawkes, DSC-P
P.O. Box 25287
Denver, CO 80225-9901
Olym_gmp@nps.gov

Dear Superintendent Laitner,

We appreciate the opportunity to comment on Olympic National Park's General Management Plan.

The Park's preferred alternative, Alternative D, takes a balanced approach between resource protection and visitor use. We support Alternative D in its main provisions. However, we believe portions of Alternative B, which favors resource protection, should be blended into Alternative D.

Area boundary adjustments proposed in Alternative D total about 16,000 acres. However, adjusting the Park's boundaries by 87,000 acres, as proposed in Alternative B, would greatly add to improved watershed and ecological protections. The larger boundary addition should be the overarching goal of the final General Management Plan, along with commercial activities continuing at current, but improved, levels.

1. We support Alternative B's larger boundary adjustments in the five lake areas (Crescent, Ozette, Hoh, Quinault, and Queets) and the Hoh River corridor because it will help better protect the habitats important to wildlife.
2. While we support the Plan's concept of upgrading the developed infrastructure in the front country and relocating some camping and lodging away from sensitive areas, we do not support increasing the number of camping sites and lodging facilities. An exception might be in the Ozette area if future Park

boundaries are expanded...new facilities in clearcuts, away from sensitive areas, could be considered.

3. River protection corridors should be established to ensure that critical salmon habitats and natural river processes are protected. This is proposed in Alternative B. When the Olympic National Forest conducted a study in 1990, it found that 14 rivers were considered eligible for federal Wild and Scenic Rivers designation. We strongly recommend that the ONP GMP include objectives of adopting Wild and Scenic designation for the Park's rivers. Congress declared the Wild and Scenic Rivers Act to be . . . "the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations."

4. We support the Plan's proposal (in both B & D) to establish intertidal reserves on the Olympic Coast and recommend a wilderness study for the Lake Ozette region and the lands proposed for adding to ONP.

5. We support bringing ONP's wilderness back to being a more complete, natural habitat by restoring extirpated species, such as the wolf and fisher.

6. We recommend that seasonal shuttle transportation be provided, and its use required, on corridors such as the Obstruction Point Road where dust control is a recurring problem and trailhead parking is limited.

We appreciate the Park's work in producing a thorough, usable, and factual report, one that is worthy of the Park it represents and is worthy of the skilled management job the staff currently performs. Thank you for your attention to our comments.

Sincerely,

Sue Chickman
Conservation Committee
Olympic Peninsula Audubon Society

Comment 305-Pacific Northwest Trail Association

PEPC 190764-305

Name: Daniel M. Collins
Organization: Pacific Northwest Trail Association
Organization Type: I - Unaffiliated Individual
Address:
Seattle, WA 98144
USA
E-mail: dcollins@pnt.org

Correspondence Information

Status: New **Park Correspondence Log:** 190764
Date Sent: 09/25/2006 **Date Received:** 09/25/2006
Number of Signatures: 1 **Form Letter:** No
Contains Request(s): No **Type:** Web Form
Notes:

Correspondence Text

Trail corridors throughout the Park lands and particularly those trails of regional significance should receive concentrated trail maintenance and rehabilitation. Expansion would be a good role after existing trails are brought up to standards. Also, consider that many trail points of interest often are more than 6 miles from trailheads, and therefore it is paramount that access for stock animals be provided so that trail work teams supplied by stock animals can provide necessary maintenance throughout the trail system. Good stock and hiker access becomes a symbiotic relationship in this regard.

The future changes to park visitation for both the new scientific and recreational value caused by the Elwah Dam removal appear to be understated.

With regard to park structures and concessionaire facilities I am of the opinion that these need to be built and maintained in a "grander style" consistent with what exists in our other national parks particularly in view of the beautiful timbers harvested from the Olympic Peninsula over the last 100 years. For instance, why are the cabins at Sol Duc Hot Springs odd, non-descript, and reminiscent of cheap dwelling units?

Finally, in the Olympic National Park planning efforts that will come after this General Management Plan is adopted, it will behoove the park service to work closely with the indian tribes in crafting access provisions, and facilities for visitation for the good of the whole.

Thank you for your consideration.

Sincerely,

Daniel Collins, Regional Coordinator PNTA

Comment 589—Peninsula Citizens for the Protection of Whales

RECEIVED	PEPC 191243 ⁵⁸⁹ RECEIVED
OCT - 2 2006	OCT - 2 2006
DSC-P	DSC-P

Comments on Olympic National Park
General Management Plan -

My comments will concern a topic not mentioned in the Draft. I did attend the open house in Port Angeles and asked whether it was a moot point to comment on an issue not referred to. The answer was: "Please comment on anything!"

So - in a nutshell, many people are concerned about various potential impacts of a revived Makah whale hunt. The issue is now "on hold" as the NMFS/NOAA prepares a court-ordered EIS. However there is a fair likelihood that whale hunting will resume in the near future. The preferred timing and location of whale hunting by the Tribe could and has varied from "no time or area restrictions" to "fall-winter-spring hunts on the outer coast". In either

(2)

scenarios there will likely be whales pursued, harpooned, and shot at with a .50 calibre anti tank gun in the near-shore waters just off the Park wilderness beaches from Shi-shi to the Norwegian Monument. The whale shot in 1999 was taken within a half mile of the beach near Father + Son rock. As that whale was being shot at from a motorized boat, several bullets missed + flew off through the air. Toward shore? Maybe.

Ballistics expert Roy Kline testified to the 9th Circuit Court that a .50 cal bullet can travel many miles on a missed or ricocheted shot. That undisputed testimony caused NMFS/NOAA to withdraw support for a hunt area inside the Straits to Tongue Point based on the

(3)

danger to the public. Public safety trumped the Tribe's desire to hunt in the calan near-shore waters of the Strait.

The same danger exists for Park visitors camping or hiking on the Wilderness Coastal Strip.

This information was given to Supt. Dave Morris in 2001.

We had a good dialogue on the topic + it was suggested to him that the Park express safety concerns to the NMFS EIS process. He agreed that would be appropriate.

The issue of Treaty rights and park safety would be resolved if the Makah whale hunts of the future took place at least five miles off shore. That would place the hunt in the migratory corridor while keeping the .50 cal weapon at a safe distance from the Park.

4

We recommend immediate communication of these concerns to NMFS/NOAA. A "big game hunt" with a big gun has no place within range of our Wilderness Park area.

Thank you for your consideration of this issue -
Margaret Owen
Margaret Owen
for Peninsula Citizens for the
Protection of Whales
612 Schmitt Rd,
Port Angeles, WA,
98363
ph. (360) 928-3048