

Olympic Park Associates
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February 13, 2013.

Superintendent Sarah Creachbaum
Olympic National Park
600 E. Park Avenue
Port Angeles, WA 98362

Re: ONP Wilderness Stewardship Plan, Scoping Comments

Dear Superintendent Creachbaum,

Olympic Park Associates (OPA) has had a long and active history with the Olympic Wilderness. OPA was established in 1938 to defend the wilderness valleys of the west-side rain forests from logging and development. We submitted our first detailed Wilderness Plan to the Park in 1968. We testified at the 1973 wilderness hearings in Port Angeles; we worked diligently for passage of the 1988 Washington Parks Wilderness Act, and we have been longtime advocates for this current planning effort. From its beginning, Olympic has been a wilderness park, as confirmed by this *Seattle Post-Intelligencer* headline in the August 28, 1938 edition: "[Interior Secretary] Ickes Says New Park to Remain Wild." As such, Olympic has been one of the premiere wilderness parks in the nation, finally achieving congressional designation 25 years ago. "What better way to celebrate our park's golden anniversary than to place the park's matchless wilderness lands in the National Wilderness Preservation System," OPA's Rick Rutz testified at the wilderness bill hearing in Washington D.C. that year.

OPA believes that management of the Olympic Wilderness sets a precedent throughout the National Park Service, the agency that manages the most designated wilderness acreage in the nation. We thank you for pursuing this planning effort and we commend the Park Service on the thoroughness and expertise it brings to the process. We are pleased to share our thoughts on the scope of the coming plan.

Purpose of the Plan and Decisions to be Made

We concur wholeheartedly with the stated purpose of the plan: "to guide the preservation, management, and use of the park's wilderness areas as defined by the Wilderness Act of 1964." And we support its goal: "to restore, protect, and enhance overall wilderness character of the Olympic Wilderness." The plan's focus on wilderness character is commendable, as that is the central governing quality of wilderness as defined by the Wilderness Act.

Under "Decisions to be Made," in your Wilderness Planning Newsletter (Winter 2013), it is stated that the Wilderness Stewardship Plan will establish a vision for the Olympic Wilderness. OPA, of course, has a vision for the future of the

Olympic Wilderness. But we respectfully submit that a vision for the Olympic Wilderness is clearly and eloquently stated in the 1964 Wilderness Act. *"A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain,"* (Sec. 2 (c)). The definition goes on to describe *"An area... retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions."*

This definition is quite visionary, in our eyes. More importantly, it sets a standard to which the Park Service and visitors to the Olympic Wilderness must adhere. We have no doubt that other visions of the Olympic Wilderness exist. Experience tells us that they will include various "visitor services and facilities" (to quote from Newsletter Question 5) ranging from destination resorts to aerial tramways. But in light of your stated purpose -- as well as your legal responsibilities -- such visions are irrelevant to this planning process.

OPA's vision for the Olympic Wilderness is similar to our vision for the future of Olympic National Park: that the Olympic Wilderness will preserve and protect a fully restored wilderness ecosystem with its original components, species and habitat functions intact. Human use will be managed to insure enjoyment of the wilderness while protecting the healthy functioning of ecosystems into the future.

Ecosystem Protection and Global Warming

The Wilderness Act states that in wilderness *"earth and its community of life... is protected and managed so as to preserve its natural conditions"* (Section 2(a) and 2(c)). With the unknown ecological disruptions that current human-caused global warming poses to Olympic Wilderness, it is of the utmost importance that park managers do all they can to protect and restore the wilderness's irreplaceable natural ecosystems. These are of planetary importance as evidenced by UNESCO's Biosphere Reserve and World Heritage Site designations. Scientific consensus holds that one of the best strategies for coping with accelerated global warming is the protection and restoration of fully intact and functioning natural ecosystems, "keeping all the cogs and wheels" in the words of Aldo Leopold. At Olympic, that means restoring extirpated species, such as the park's keystone predator the wolf, recovering threatened species, and eliminating non-native species, such as introduced mountain goats. Non-native and invasive plant species should be eliminated where possible, otherwise controlled. The plan should recommend active restoration of the Olympic Wilderness's "community of life," particularly in light of coming ecological disruptions.

Wilderness District

With 95 % of Olympic National Park in designated wilderness, the plan should make it a priority to establish a separate wilderness district to oversee management activities in the Olympic Wilderness. A wilderness ranger in charge of a wilderness district would be well trained in wilderness stewardship, minimum requirement, and the legal tenants of the Wilderness Act. We feel this would be superior to the current approach of piecemeal management of wilderness by area rangers, all with extensive law-enforcement responsibilities for front-country areas. Further, it would reflect the central importance of wilderness to Olympic National Park.

Wilderness Character

Wilderness character is a quality that has proven difficult to define, and its protection has presented a challenge to park managers in the past. We endorse the use of the interagency study "Keeping it Wild" to help establish benchmarks and guides for the planning effort. Your discussion of wilderness character under the "Key Components of the Plan" section of the Wilderness Planning Newsletter does a good job of presenting the concepts. The four qualities referenced from that publication: "Untrammelled," "Natural," "Undeveloped," and "Solitude or Primitive and Unconfined Recreation," set clear directives for meeting the stated purpose of the plan.

However, we are troubled by your fifth quality, "Other Features of Value," inserted without citation, that purports to have precedence over the previous four, which reflect the clear intent of the Wilderness Act. The newsletter states that this quality "is used to capture elements of a park's wilderness area, such as Olympic's cultural resources, that aren't included in the four qualities and is unique to an individual wilderness." OPA supports the preservation of what are widely valued as cultural resources: Native American archeological sites, artifacts, petroglyphs, shell middens and other resources that reflect the early human presence on lands now protected by Olympic National Park. However, we have a real concern that the park's historic view of cultural resources, which include human constructions dating a minimum of 50 years, will confuse the issue and undercut the preservation of wilderness character as directed by the Wilderness Act. We refer to the "List of Classified Structures for the Park" that was attached, without adequate discussion or review, as Appendix E to the 2008 General Management Plan. The list includes some 40 structures and eight "historic landscapes" located in the Olympic Wilderness.

These include ranger stations, sheds, shelters, homesteads, barns, hunting cabins, a chalet, and under landscapes, the 1930s Forest Service trail system. Many are administrative structures built by the Park Service or Forest Service. Others represent the kinds of private development of wilderness that Olympic National Park was created to stop. Several structures on the list no longer exist. Yet the General Management Plan directs that they are to be "protected and

maintained" in wilderness, and the park has invested significant manpower and funds in recent years, and employed the use of helicopter transport and power tools to repair and reconstruct these structures. We interpret your "Other Features of Value" as a further attempt to continue to preserve, repair and reconstruct these structures in wilderness, now as components of wilderness character "unique to the Olympic Wilderness."

We find this contrary to both the 1964 Wilderness Act and the U.S. District Court decision *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 Wilderness Act in no way yields priority to the National Historic Preservation Act or to DOI or NPS administrative policies. Nor would it to this plan. Wilderness designation places "a new value" on the land, in Judge Burgess' words, that is, a clear mandate to preserve wilderness character -- not to attempt to re-define it to include nonconforming uses. Further, to suggest that wilderness character is "improved" by the preservation or restoration of such features, even when such management actions degrade other qualities of wilderness character " (i.e. untrammeled, natural, undeveloped, and solitude) begs credulity.

At a minimum, this planning process should examine each of the classified or listed structures currently being preserved in the Olympic Wilderness and evaluate, with open, public review, which ones may be "unique" to the Olympic Wilderness and indeed enhance the area's wilderness character. For all but a precious few, that is an extremely high bar to reach. Management recommendations should follow.

Wilderness Issues and Opportunities

We would like to comment briefly on the issues listed in the newsletter as well as some of our own. We hope all will be addressed in the plan.

* Day and overnight use. Overnight use is currently well regulated in the park. A process for identifying new areas where overnight quotas may need to be assigned, or fragile areas that should be closed to overnight use, should be outlined in the plan. Day use in a few heavy-use areas may also need to be addressed at some point to preserve wilderness character. Management of parking areas outside wilderness may be a useful tool for this.

* Wilderness permitting. We support the current permitting system and the opportunity for wilderness education that it affords. The plan should encourage adequate staffing to insure both education and enforcement.

* Traditional use. Any traditional uses should fall under the constraints of the Wilderness Act. Traditional uses should be allowed to the point that they do not

damage or degrade the wilderness environment or negatively affect wilderness character.

* Use of campfires. With the Olympics' unpredictable weather patterns, campfires should continue to be allowed in lower valleys, in existing fire rings only. Alpine and subalpine areas and all off-trail areas should continue to be closed to fires.

* Proper food storage. Hanging of food should continue to be allowed where conditions for safe food hanging exist. Limited use of bear lines should be permitted where feasible. Canisters should only be required in areas where hanging food is impossible. No food lockers should be placed in wilderness.

* Group size. Maximum group size should be kept to 12 backpackers, fewer in sensitive areas where group camps do not exist. Maximum group size for stock users should be keyed to capacity of stock camps. Appropriate limits should also be set for day-use group sizes.

* Camping and campsites. Currently, camping is well managed by the Wilderness Information Center. Camping should be keyed to carrying capacity of valleys and destinations. Numbers of campers should be regulated in high-use sites such as Shi Shi Beach. In higher elevation areas, camping should be permitted in designated sites only, with dispersed camping allowed in remote trailless areas. Some sensitive or damaged areas may need to be closed to camping for extended periods. Development of new campsites in wilderness should be prohibited.

* Human waste management. OPA supports "blue bag" or (more efficient) "wag bag" management of waste on Blue Glacier and other sensitive alpine areas. Vault and solar privies are suitable for high elevation areas. Helicopter transport of vaults should take place only after peak-use seasons. Pit privies are adequate in lower areas and should be present at high use-campsites in lower valleys.

* Stock use. Stock use has been inconsistently managed at Olympic, and high-elevation trails and natural resources have suffered. Specific areas should be defined where stock use is appropriate and compatible with hikers, trail conditions, and natural resources. Stock should be confined to designated trails and stock camps. Some alpine trails such as High Divide, Grand Valley, Grand Ridge, Skyline and other trails through sensitive areas should be closed to stock use (rather than posted as "not-recommended"). Stock camps should be located in low-elevation valleys apart from backpacker camping areas. With frequent stream crossings on most trails, manure-catchers should be required for stock.

* Research activities. Research by park natural science staff and independent researchers should comply with wilderness use regulations and minimum requirement standards. Where use of aircraft is absolutely essential (i.e. aerial

wildlife surveys, animal removal), flights should be timed to minimize disturbance to wildlife and wilderness users. The current marbled murrelet/spotted owl nesting season closure to helicopter use could be adopted as a permanent regulation to preserve silence as well as wilderness character. Research structures such as the Glacier study hut on Mount Olympus should be evaluated to assess their necessity in wilderness.

* Wildlife management in wilderness. Restoring and protecting ecosystem processes, restoring extirpated species, and removing non-native species should be an objective of this plan. Functioning ecosystems are an essential component of wilderness character in Olympic. Management activities should comply with minimum requirement directives. Parameters for necessary flights for wildlife survey and management activities should be addressed in the plan.

* Cultural Resource Management in Wilderness. To our knowledge, few Paleo-Indian or Native American cultural resources have been restored or reconstructed in the Olympic Wilderness. Archeological sites are investigated and recorded. Artifacts are collected, catalogued and curated. Many known sites are left uninvestigated due to lack of available funding. We consider the archeology program at Olympic to be exemplary. It is entirely compatible with wilderness and enjoys OPA's full support. If anything, it is deserving of increased funding. We see the historic preservation program at Olympic as a different kettle of fish. This program has funded numerous reconstructions of historic structures in wilderness (nearly all without public review). We find many of these to be of questionable historic value and disproportionate in their allocation of resources. One, that was open to NEPA review, was found to be in violation of the Wilderness Act. Others may be as well. We hope this plan will, at a minimum, set clear and legal limits on historic preservation activities in the Olympic Wilderness, requiring full compliance of these activities with NEPA and the Wilderness Act.

* Maintenance of trails, bridges, or other existing or necessary infrastructure. The park has done an excellent job maintaining Olympic's trail system. The plan should endorse continued maintenance of the trail system while seeking opportunities to reduce the footprint of human influence. Some stringer bridges could be replaced with foot logs and stock fords, puncheon bridges by gravel turnpikes. Major bridge construction projects, like Staircase Rapids bridge, should require full NEPA compliance. Lesser used trails should qualify for a lower level of construction and maintenance. Historic trails that are no longer maintained should be closed and rehabilitated to preserve and enhance trailless areas in the wilderness core. Trail maintenance and trail structures should be aimed primarily at resource protection. Administrative structures like guard stations and lookouts should be evaluated to assess their status "as necessary to meet minimum requirements for the administration of [the wilderness] (section 4. (c))." We feel most will comply. Some, like Hayes River Guard Station (which in

close proximity to Elkhorn Guard Station and duplicates efforts), could be removed.

* Commercial services in wilderness. We support continued commercial services in wilderness at current levels. Commercial use permits should stipulate that wilderness education be a required activity. Outfitters should not receive special treatment regarding reservations, group size, or access. Volunteer projects should be encouraged as part of guided trips.

Other issues and opportunities that should be addressed in the plan are:

* Mechanized tool use. OPA believes a strong case can be made for use of chainsaws as minimum tools to effectively and safely clear the often heavy amount and large size of blowdown timber on park trails. The plan offers an excellent forum to have that discussion.

* Mechanized transport. Helicopter transport has become fairly common for administrative purposes in the Olympic Wilderness. We recognize that some uses, such as emergency rescues and some wildlife research and management require helicopter use. Similarly, helicopter transport of steel bridge stringers can substitute for the use of large old-growth trees for stringers in wilderness. At the proper season we see this as an allowable tradeoff. We request the plan outlines those needs and sets standards and seasons of operation for mechanized transport.

* Native materials. Use of native materials should be approved by wilderness managers prior to construction. In general, native and natural (packed-in) materials should be favored over glue-laminate and chemically treated lumber in bridge and puncheon reconstruction. Even when steel stringers are used, wilderness bridges should be decked and finished with natural wood. Construction of new buildings, even when classified as historic repair and rehabilitation, even when using native materials, is illegal under the Wilderness Act and should be prohibited.

* Wilderness fees. OPA supports reasonable wilderness fees. We request that Olympic's wilderness permits be considered special use permits so full fee revenues can be retained in the park and used for stewardship activities in the Olympic Wilderness.

* Coordination with other agencies. Protocols should be established for coordination with Forest Service wilderness managers on issues surrounding trails, visitor use and education, fire management, and other issues affecting adjacent wilderness areas.

The danger facing the Olympic wilderness in the coming decades is the danger facing all of the earth's irreplaceable nature preserves: that this remarkably

diverse and intact ecosystem will experience a slow, gradual degradation. As population pressures increase and the world's climate continues to warm, it is imperative to protect and preserve Olympic's wilderness. We look forward to working with you to develop an outstanding stewardship plan for the Olympic Wilderness.

Again, we appreciate the opportunity to participate in this important planning effort. We look forward to continuing to participate in the process.

Sincerely,
Tim McNulty
Vice president, OPA