



168 Lost Mountain Lane, Sequim WA 98382, mcmorgan@olypen.com

April 11, 2014.

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

**Re: ONP Wilderness Stewardship Plan, Preliminary Draft Alternatives**

Dear Superintendent Creachbaum,

Olympic Park Associates (OPA) commends you and your staff for assembling the groundwork for a sound and visionary stewardship plan for the incomparable Olympic Wilderness. The draft zones and preliminary alternatives offered for public comment represent far-reaching measures that will protect this popular wilderness and its outstanding ecosystems for the coming decades. The draft zones reflect a solid foundation for managing appropriate levels of trail development and visitor use. And excellent options for protecting the Olympic Wilderness can be found in all three proposed action alternatives.

Equally as important, we find the recommendations that are common to all action alternatives (CTAA) to be well thought out and appropriate for a wilderness that that is bound to experience increasing demands over the coming decades -- and for an ecosystem that faces unknown threats due to changes in climate and resulting impacts on habitats. OPA supports all of the (CTAA) recommended actions, though we recommend modifications for a few.

Among the actions CTAA we wholeheartedly support:

- \*Carrying capacities and quotas will be set for high-use areas.
- \*No new trails will be constructed.
- \*Trail-less wilderness will be retained.
- \*Visitor use will be managed to reduce impacts on native species.
- \*Exotic plants and animals will be eliminated or controlled.
- \*A restoration plan/EIS for the gray wolf will be developed.
- \*Stock use will be regulated and confined to designated trails.
- \*No new radio or transmission towers will be installed.
- \*Wilderness education will accompany all permits.

A few of the action items could still be fine-tuned, for example:

\*Threatened, endangered and at-risk species will be monitored. We think the plan should recommend that they be recovered and restored.

Overall, OPA endorses an approach that would best protect natural resources and ecological process as displayed in Alternative C, but with the some significant elements taken from Alternative B as well as a few from D.

We agree with the stated emphasis of Alternative B, reduction of the human footprint. This alternative contains the soundest recommendations regarding management of historic structures in wilderness, quotas and use limits, limits on administrative use of aircraft and administrative tool use among others.

We place a higher degree of importance on Alternative C, which emphasizes protection of natural resources and ecological processes. To us, this alternative contains the best recommendations for wilderness trail and campsite zoning (refined with elements from other alternatives as discussed below), trail and bridge management, stock use, and campfire restrictions. It presents the best strategy for protecting ecosystem components and functions into an uncertain future.

Lastly, Alternative D offers some wilderness experiences for visitors that we feel could be accommodated without compromising the management directions of B and C. Ranger-led interpretive hikes could be increased, tribal access to ethnographic resources could be permitted within the limits of the Wilderness Act, and a few trail zone elements could be adopted without impacting wilderness character or natural resource protection.

Specific recommendations drawn from each of these alternatives follow.

OPA considers Alternative C to present the best strategy for preserving the stunning diversity of natural species and environments that make Olympic National Park what it is. Identifying heavily used nature trails (zone 1) and maintaining popular access trails up river valleys and major passes (zones 2 and 3) will allow for maximum enjoyment of the wilderness while protecting natural resources and wilderness character. The careful delineation of primitive trails (zone 4) and way trails (zone 5), and regulating camping in fragile, alpine and less-heavily used environments provide sensible limitations on the use of these areas. It is expected that some level of trail maintenance is allowed in zone 4. OPA supports this, of course, but it should be further clarified in the draft plan. Misinformation abounds.

OPA particularly supports zone 4 prescriptions in C, with fewer maintained trails, and zone 5 in C, with no maintained trails. As pressures on back country areas increase, places such as the Skyline trail from 3 Lakes to Low Divide and Martin's Park trail should be zone 4, primitive, and the Bailey Range, Dodger Point high route, Lillian Ridge, upper Royal Basin, Lake Constance, and Lake of

the Angels should certainly be placed in zone 5. Boot-worn way trails should suffice.

We also support specific trail zone elements from other alternatives that would increase resource protection yet allow for a modest increase of compatible use on some trails.

To the sound allocations in Alternative C, we would add the following allocations from Alternative B:

Shi Shi Beach should be zoned 3, secondary, rather than 2, all-purpose (as in C). This area has experienced serious overuse; the current access trail descends a steep bluff (similar to overland trails on the south coast, which are zoned 3). We believe the old overgrown military road should not be re-opened for trail access, nor should zone 1 or 2-level trail structures be incorporated into the approach trail for Shi Shi. This is arguably the most scenic of ONP's wilderness beaches and one of the easiest of access. Quotas for overnight use should be set and secondary foot trail access maintained.

The North Fork Sol Duc should be zoned 4 and 5, primitive and way trail. This reflects current use level and difficulty of access (a river ford difficult to cross early in season). Visitors desiring more developed wilderness trail access have multiple options just up the Sol Duc Road.

The South Fork Hoh trail should be zone 4, primitive, to preserve one west-side rain forest valley available for a more intimate trail experience free of stock use, developed trail structures and developed campsites

Similarly, the Rugged Ridge trail should be classed as zone 4, primitive, to reflect current use and comply with nearby Hoh-Bogachiel trail zoning.

Aurora Ridge should be zoned 4 and 5 for similar reasons.

From alternative D, we recommend:

Within the following trail zones 2 and 3 we recommend traditional stock use be allowed on the Queets River trail; the Dosewallips/Hayden Pass/Hays River trails; and the Boulder Creek trail (to horse camp/former parking area at Olympic Hot Springs). These would be added to the stock trails already included in alternative C: the Dosewallips/Anderson Pass/Quinault trails; Duckabush/First Divide/Skokomish trails; Elwha/Low Divide/North Fork Quinault trail; Long Ridge and (lower) Lillian trails; the Hoh River trail to Elk Lake, and the Bogachiel/Little Divide/Mink Lake trails. All are well constructed and maintained trails and could be accommodated with minimal impacts to fragile areas. Due to their non-discriminating appetites, "pack goats" should not be allowed in the Olympic Wilderness.

#### Other Elements of the Plan

OPA endorses other elements of the draft alternatives that are noted below. There are also a few issues we addressed in our scoping letter that still need attention.

Historic structures. We strongly endorse the decision not to consider historic structures to be contributing elements of wilderness character. This clarifies the issue and affirms the clear intent of the Wilderness Act.

The prescriptions for historic management in Alternative B are most in keeping with wilderness principles: no reconstruction of historic buildings that have naturally deteriorated; allowing natural processes to take precedence; and developing a determination of which historic structures and landscapes would be maintained in wilderness. We request that this determination be included in the draft wilderness stewardship plan under NEPA with full public participation and review.

OPA sees an important distinction between Native-maintained coastal prairies, with their associated species diversity, and old homestead clearings, with their exotic grasses. We support careful management of the first, and recommend natural succession for the latter.

Scientific research. The flexibility provided to researchers within the permitting process in alternative C offers the best approach to managing this important aspect of wilderness.

Park operations. OPA favors the moderate directions in C where park operations would be more reliant on non-mechanized and non-motorized equipment and transport, but with some flexibility in management decisions and applications.

Fire. Alternative B best recognizes the ecological role of fire in the landscape within the constraints of adjacent lands and public safety. We consider hazard fuel reduction activities to protect nonessential buildings in wilderness inappropriate.

Campsites and commercial services. We agree with the approach in C that would retain the number of campsites and the amount of commercial services at about the level same as present. Monitoring is advised. In Washington's other two national parks, commercial reservations have taken up high percentages of use in quota areas.

Bear canisters. There would be educational value in relabeling these animal-proof canisters, so as to not single out the bears. Rodents and raccoons are actually more of a problem in many areas. We understand the desire to require canister use throughout the park, but we suggest a liberal phase-in period during which existing food hanging would be retained in heavily used sites.

Waste management. We recommend continuing use of solar composting privies or other developing technologies in high-use subalpine areas and pack-out bags on Mount Olympus and alpine areas where waste becomes a problem.

Accessible trails. OPA has long supported accessible and interpretive trails in front country. They are equally appropriate in some Zone 1 wilderness areas.

Wilderness District. To insure that these and other measures in the plan receive full consideration in the day-to-day management of the park, OPA once again requests that the plan recommend a wilderness district be created for the Olympic Wilderness, and a wilderness district ranger assigned to oversee all park operations within wilderness.

We wish to thank park planners for the thorough and diligent job they have done thus far in identifying key issues and appropriate management prescriptions. We encourage you to continue in this positive direction to create a stewardship plan worthy of the magnificent Olympic Wilderness.

Sincerely,

Tim McNulty  
Vice president  
Olympic Park Associates