



September 18, 2014

Superintendent Sarah Creachbaum
Olympic National Park
600 E. Park Avenue
Port Angeles, WA 98382

Re: Olympic National Park Mountain Goat Management Plan and EIS

OPA is pleased to provide scoping comments on Olympic's Mountain Goat Management Plan. We are heartened to see the park returning to this issue after a 20-year hiatus. The 5% annual increase in goat population since 2011 and the increasing impacts of non-native goats on alpine and subalpine plant communities, wildlife populations, soils, ecological processes, and visitor safety make this a critical and timely issue.

Plan Objectives

OPA concurs with the plan's stated objectives, particularly the need to "Further public understanding of the Olympic's alpine ecosystems and native species and the ecology and conservation of mountain goats in their native range." Your earlier draft plan and EIS (1994) put forth a sound analysis and workable preferred alternative, but it was abandoned due to misunderstandings and misinformation regarding exotic goats and their impacts on park resources. We hope educational efforts are mounted during this round of planning to insure the current plan does not succumb to similar misunderstands.

Global Warming and Goats

With the effects of global warming becoming apparent in Olympic, OPA considers it essential to restore the park's durable ecological communities and processes. As you know, the alpine and subalpine plant and animal communities of the Olympics have survived through severe climatic fluctuations of the past two million years and beyond. It is important to note that subalpine plants and animals -- including five endemic wildlife species (one species, Olympic marmot, and four subspecies) -- utilize the same subalpine habitats as non-native mountain goats. To our knowledge, these communities have evolved without the presence of large rocky-outcrop herbivores. The unique character of these communities, rich with endemic, near-endemic, rare, and disjunct plant species and associations, may be a direct result of this condition.

The EIS should include a vigorous evaluation of impacts to these species and communities as well as soils, ecological processes, and wilderness character by exotic mountain goats.

Management Directives and Obligations

The plan should clarify the park's management obligations regarding non-native wildlife in light of the 1916 Organic Act, the 1964 Wilderness Act, current NPS management policies, Olympic's 2008 general management plan, and NEPA. It should examine the various approaches and effectiveness of other national park efforts to deal with exotic wildlife. Hawaii Volcanoes, Haleakala, Channel Islands, Rocky Mountain, Death Valley, Grand Canyon, Great Smoky Mountains, Yellowstone, and Big Bend among other parks have embarked on alien wildlife removals. Many if not most have been successful. What can Olympic learn from those efforts?

Other Agencies

We are also aware that some mountain goat populations have become threatened in their native habitats in other national parks, national forests, and tribal lands. We urge the park to work closely with these agencies regarding possible relocation of Olympic's goats.

It is important that the park also work with Olympic National Forest and the Washington Department of Fish and Wildlife in an effort to address mountain goat populations adjacent to the park that can act as source populations that can affect various management strategies in ONP.

Draft Alternative Concepts

OPA appreciates the opportunity to comment on draft alternative concepts during the scoping phase. The six alternatives (No Action, Combination of Alternative Concepts, Increased Nuisance Control, Capture and Translocation, and Removal) broadly cover the options available to park managers. We would suggest other options that involve coordination with other agencies and continual ongoing efforts to address goats migrating into the park. We also recommend an alternative (or part of a preferred alternative) that, short of removal, would at the very least establish permanent goat-free areas in parts of the park that are known to support the largest concentrations of rare and endemic plants such as the north-central , northeast, and eastern alpine areas.

OPA looks forward to working closely with park planners to insure an effective plan and implementation program is put in place to address this long-standing resource problem at Olympic.

Sincerely,

Donna Osseward,
President, OPA