



**Olympic Park Associates**

September 15, 2017

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

Re: Olympic National Park Draft Mountain Goat Management Plan / EIS

OPA is pleased to provide comments on Olympic's Draft Mountain Goat Management Plan / Environmental Impact Statement. It is a comprehensive document that frames the issue clearly and presents a workable plan for eliminating non-native mountain goats from the Olympic Mountains. Importantly, the plan clarifies the Park's management obligations regarding non-native wildlife. And it offers a vigorous evaluation of impacts to native plant and wildlife species and communities as well as soils, ecological processes, and wilderness character by exotic mountain goats.

The eight percent annual increase in goat population and 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 action. We are heartened that the Park Service is cooperating with the Forest Service and Washington Department of Fish and Wildlife in the planning effort. This approach, missing from the 1995 draft plan, will insure that non-native goats will be removed from both the National Park and Forest. We fully support the effort to assist in the recovery of native mountain goat subpopulations in the North Cascades. And we consider the aircraft operations and use of firearms to meet the minimum requirement necessary to restore natural conditions and wilderness character to the Park and Forest Service wilderness areas.

#### Preferred Alternative

Olympic Park Associates (OPA) supports the Park's preferred alternative (D), live capture and translocation followed by lethal removal by shooting. It is a workable and effective strategy for eliminating non-native goats from both Olympic National Park and Olympic National Forest. However, we have concerns over the timeframe offered under this alternative. It appears that WDFW's desire to translocate a large number of goats to target areas in the Cascades has led to a longer period of live capture than we believe is necessary. This could result in greater impacts from helicopter operations in the Park and wilderness (including wilderness areas in the Cascades), extended periods of operation, and eventually increased safety risks. The latter became a serious issue during live capture operations in the 1980s.

We recommend that the preferred alternative be modified in the final EIS to require one year of live capture followed by one year of concurrent live capture and active lethal

removal as opportunity and logistics dictate (rather than waiting until live capture becomes too difficult, dangerous, or funds run out). After that, by year three, lethal means would be employed exclusively to remove remaining goats. Under this scenario, most activity would take place in years 1 to 3 rather than 1 to 4. This approach would reduce operational impacts to wilderness and Park resources while supplying a reasonable number of goats necessary to supplement North Cascade populations (though perhaps less than the nearly 400 goats WDFW would like to translocate). At the same time, it would expedite what we consider to be the highest priority goal of the proposed actions, removing all non-native goats from the Olympics.

#### Purpose and Need for Action

We agree with the stated purpose for taking action (p. 1), but suggest the language be changed in the final EIS to drop "reduce" and state that the purpose of the final plan is to eliminate impacts on Park resources from exotic mountain goats. This will hopefully comply with the prescribed action.

We applaud including the need to remove mountain goats from adjacent lands in Olympic National Forest in the "Need" section. We hope this sound ecosystem approach will guide further cooperative planning between the Park, Forest, state, and tribes.

#### Issues and Impacts: Wilderness Character

The discussion of wilderness character in the summary on page 11 may lead to some confusion. There is no doubt that the presence of mountain goats in wilderness adversely affects the natural quality of designated wilderness, both in the Park and National Forest. Indeed, trampling, grazing, and wallowing by goats has inflicted decades of damage upon the Olympics' unique and irreplaceable alpine and subalpine plant communities. It is also true that proposed management activities such as use of aircraft and firearms will negatively impact aspects of wilderness character. But the two are separated by orders of magnitude. The presence of non-native goats has seriously degraded the natural character of the wilderness, plant and wildlife communities including rare and endemic species (33 plants, several mammals), ecological processes, and soils for nearly a century. If allowed to continue, the presence of goats threatens to do so well into the future. Management activities, in sharp contrast, will be temporary and brief. The latter represents the minimum necessary to correct the former. That the two are presented as issues of equal importance can lead to confusion. This pairing is carried through other issue topics as well.

While the fuller treatment of wilderness character in Chapter 3 is more lengthy and nuanced, we take issue with an item in the "Untrammeled" section. We disagree that "The untrammeled quality is further degraded by actions that intentionally manipulate the biophysical environment (e.g. the removal of nonnative species...)" (p. 76) We believe ecological restoration of natural conditions, such as removing non-native goats or returning native salmon to the Elwha watershed, protects and restores the untrammeled (or unmanipulated) quality of wilderness. Allowing human-introduced exotic species to continue to degrade natural environments further degrades wilderness

character. The discussion of the "Natural" quality on the next page gets this right. Untrammelled and natural should not be in conflict.

We consider the summary discussion of environmental consequences of Alternative D on wilderness character ("Cumulative Impacts" and "Conclusion" pp. 146-147) to be fair and adequate. The final sentence in the Cumulative Impacts paragraph appears to address our overriding concern with this discussion, but the final clause renders it unnecessarily difficult to parse. "In the long term, the removal of mountain goats would allow the recovery of the natural quality of the wilderness character from the elimination of an exotic species, and Alternative D would therefore contribute a minimal adverse increment to the overall adverse cumulative impact." (p.146)

Alternatives.

Were it not for the goal to supplement distressed mountain goat subpopulations in the North Cascades, Alternative C, lethal removal, would be the most efficient means of eliminating non-native goats from the Olympics. OPA supports the translocation goal so we favor alternative D, modified as specified above. Alternative C fails to address this goal, and Alternatives A and B fail to meet the goal of a zero goat population on the peninsula.

We concur that fertility control would not be an effective method of eliminating goats, but feel that this discussion could be expanded in light of past experimentation and scientific review. We agree that public or tribal hunting in the Park is inconsistent with existing law.

We agree that Alternative D is the environmentally preferred alternative because the duration of management activities are less than Alternatives A or B, and "unlike alternative C, [it] would also contribute to the conservation of the species in their native range in Washington outside the Olympic Peninsula where populations have been depleted." (p. 69) However, there is always room to strengthen a proposed action, and lessening the duration and extent of management activities, as we suggested above, would improve the preferred alternative.

Thank you for the opportunity to provide comments on the plan. We look forward to a timely final decision and conclusive action that will resolve this long-standing issue at Olympic by removing non-native goats from the Park and Forest and maintaining a goat-free environment for the future

Sincerely,

Tim McNulty  
Vice president, Olympic Park Associates