



PROMOTING THE PROTECTION, CONSERVATION AND RESTORATION OF NATURAL FOREST ECOSYSTEMS AND THEIR PROCESSES ON THE OLYMPIC PENINSULA, INCLUDING FISH AND WILDLIFE HABITAT, AND SURROUNDING ECOSYSTEMS

October 3, 2017

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

Via electronic communication

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

Superintendent Creachbaum:

I am writing on behalf of the Olympic Forest Coalition to provide a comment on the National Park Service's Draft Mountain Goat Management Plan / Environmental Impact Statement (DEIS). The Olympic Forest Coalition (OFCO) is a membership organization based on the Olympic Peninsula with decades of conservation advocacy and experience, including efforts to protect our Olympic National Park and its precious and unique natural resources and recreation areas, wilderness, habitats, endangered and threatened species, and beauty. Thank you for the opportunity to comment on the alternatives presented in the Management Plan and the DEIS, and for the Service's efforts to manage the Park and the Olympic National Forest and Dan Evans Wilderness areas.

The DEIS presents one reasonable alternative for eliminating invasive mountain goats from the Olympic Mountains, as well as the Park's management obligations regarding non-native species: Alternative D. It contains critical scientific information and evaluation of impacts to native plant and wildlife species, soils, ecological processes, and wilderness character by the non-native mountain goats.

We are encouraged to see that the Park Service is cooperating with the Forest Service and Washington Department of Fish and Wildlife in this process; hopefully the cooperation will be successful in this effort and the elimination of the goats on the Olympic Peninsula can be achieved.

Modify Preferred Alternative D

OFCO joins the Olympic Park Associates (OPA) and other conservation organizations in supporting the Park's preferred alternative (D), live capture and translocation followed by lethal removal. We fully support the effort to assist in the recovery of native mountain goat subpopulations in the North Cascades. It is a workable strategy for eliminating non-native goats from both Olympic National Park and Olympic National Forest. However, we share concerns over the timeframe presented in Alternative D allowing a longer period of live capture than is necessary for removal, which will likely lead to greater impacts from operations in the Park, Forest and wilderness. Extended helicopter operations such as those currently planned became a serious safety issue during live capture operations in the 1980s and should be avoided.

We join OPA's recommendation 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 allow, rather than waiting until live capture becomes too difficult, dangerous, or funds run out. By year three, only lethal means should be employed exclusively to remove remaining goats. Public hunting, nor on the ground hunting of any kind, comply with legal restrictions on hunting in the Park, would increase negative environmental impacts on already impacted areas, and increase public safety concerns. Public hunting should not be allowed nor adopted in the final EIS. The reduction of

operational impacts to wilderness and Park resources while supplying a reasonable number of goats necessary to supplement North Cascade populations will not be met by public hunting.

Clarify and Strengthen the Stated Purpose

We concur in the request that the language be changed in the final EIS from "reduce" non-native goat population on the Olympic Peninsula and state that the purpose of the final plan is to eliminate the exotic mountain goats and their impacts on Park resources. Only with successful elimination of the species can the Park, Forests, and wilderness recover and thrive.

OFCO supports the goal of eliminating the non-native goats from the Olympic Peninsula and their translocation to the North Cascades as suggested in Alternative D, modified as discussed above to lessen impacts and increase effectiveness. The other alternatives will not meet this goal. Alternative C fails to address the goal, and Alternatives A and B fail to meet the goal of a zero goat population on the Olympic Peninsula. We agree that Alternative D is the environmentally preferred alternative and would also contribute to the conservation of the species in their native range in Washington where populations have been depleted.

Thank you for the opportunity to provide comments on the Plan and DEIS. We look forward to the final Environmental Impact Statement, the modification of the Management Plan, its full and timely implementation, and the full restoration of the Olympic alpine areas.

Sincerely,

A handwritten signature in cursive script that reads "Patricia A. Jones".

Patricia A. Jones
Executive Director
Olympic Forest Coalition