



May 16, 2014

Sarah Creachbaum, Superintendent  
ATTN: Wilderness Stewardship Plan  
Olympic National Park  
600 E. Park Avenue  
Port Angeles, WA 98362

Dear Superintendent Creachbaum,

Thank you for the opportunity to comment on the Olympic National Park's Wilderness Stewardship Plan – Preliminary Draft Alternatives. We appreciate the park's public engagement process and the opportunity to provide comments prior to the development of draft alternatives. The undersigned organizations represent over 30,000 members from Washington state who engage in active outdoor recreation in Olympic National Park and other public lands throughout the Pacific Northwest.

The Access Fund is the national advocacy organization that keeps climbing areas open and conserves the climbing environment. Founded in 1991, the Access Fund supports and represents over 2.3 million climbers nationwide in all forms of climbing: rock climbing, ice climbing, mountaineering, and bouldering. Six core programs support the mission on national and local levels: climbing management policy, stewardship and conservation, local support and mobilization, land acquisition and protection, risk management and landowner support, and education. The Access Fund encourages an ethic of personal responsibility, self-regulation, and Leave No Trace practices among climbers and works cooperatively with public land managers on conservation projects and management planning. A significant number of the Access Fund's members live in the Northwest.

American Alpine Club, started in 1902, has been supporting climbers for the last century. Our mission is "to support our shared passion for climbing and respect the places we climb." This is accomplished through our core values of providing authoritative climbing information, knowledge and resources, advancing our climbing interests through advocacy and leadership, and strengthening our climbing community through competency. We represent the entire spectrum of climbers in the United States from boulderers to alpinists, and help provide logistical support through industry partners and our rescue insurance. We provide grants to climbers travelling around the world, and also help fund stewardship projects around the country. The American Alpine Club has a large presence in the Northwest and many of our members climb and travel throughout the region.

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with over 6,000 individual members and 100 local-based affiliate clubs, representing whitewater paddlers across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. The protection of wilderness waterways was among our founding principles. Olympic National Park is nationally recognized as a destination for backcountry paddling in a wilderness setting.

Back Country Horsemen of Washington is one of the four heritage stock use/packing organizations from four different states that joined together to found the national Back Country Horsemen of America in 1985 for the purpose of keeping trails open and assisting public land agencies with addressing management and maintenance issues on our nation's wilderness and non-wilderness lands. Currently, the Back Country Horsemen organization has chapters in 27 states and over 13,500 members. The national volunteer effort was determined to have a contribution value of 14 million dollars for 2013 which included 30,732 stock use service days. Members of the Washington state affiliate have long been partners with the Olympic National Park in addressing backcountry maintenance and education.

The Mountaineers, founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is "to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond." Based in Seattle, Washington, we have over 13,000 members and guests in seven branches throughout Western Washington. We support over 1,500 skilled volunteers who lead 3,200 outdoor education courses and activities on everything from backcountry skiing, wilderness first aid, and avalanche safety to conservation education and advocacy. In addition, we provide over 4,000 opportunities for youth to get outside each year. Olympic National Park is an important 'classroom' and recreational area for our members.

Washington Trails Association was founded in 1966 and is the country's largest state-based trail maintenance and hiking advocacy non-profit organization with more than 12,500 members and more than 2.5 million unique annual website visitors. Washington Trails Association's mission is to "preserve, enhance, and promote hiking opportunities in Washington state through collaboration, education, advocacy and volunteer trail maintenance." In 2013 Washington Trails Association volunteers contributed 4,198 hours (\$90,000 value) of trail maintenance to Olympic National Park. Statewide, 3,400 individual Washington Trails Association volunteers contributed 108,000 hours of trail maintenance on federal, state and local lands in 2013.

Our organizations advocate for the conservation of wild places for the purpose of protecting the experiential value they provide. The Wilderness Act of 1964 states that wilderness areas "shall be administered for the use and enjoyment of the American people in such a manner as will leave them unimpaired for future use and enjoyment."<sup>1</sup> It is the opportunity to use and enjoy Olympic National Park's wilderness, and specifically the "opportunities for solitude or a primitive and unconfined type of recreation,"<sup>2</sup> that is important to our members who call this region home as well as those who travel here for the world-class opportunities that backcountry recreation provides in Olympic National Park.

We write to share our significant concerns with the alternatives provided for Visitor Use and Experience. We understand that a key goal of wilderness stewardship is to protect, restore and enhance the "wilderness character" of Olympic National Park and that a primary benefit of achieving this goal is for public use and enjoyment. Alternatives B and C are inconsistent with several aspects of the recently implemented 2008 General Management Plan and Alternative D does not meet the objectives outlined in the conceptual vision to "provide visitors with a greater range of wilderness experiences." We support an additional Alternative E that meets the objective to "provide visitors with a greater range of wilderness experiences" and the objectives stated in the General Management Plan.

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<sup>1</sup> 16 U.S.C. § 1131(a)

<sup>2</sup> 16 U.S.C. § 1131(c)(2)

### **Introduction/General Description**

We support the concept of Wilderness Zones to provide quantitative standards where management actions would be taken if acceptable levels of impacts are exceeded. However, the monitoring framework needs to be clearly articulated as part of the development of the Draft Environmental Impact Statement and the quantitative standards for “acceptable levels of impacts” should be explicitly defined.

Alternatives B and C include less infrastructure, which would be inconsistent with language in the General Management Plan stating that “facilities such a trail bridges, ranger stations, historic structures, radio repeaters, toilets, and signs would be retained and could be improved if they are determined to be necessary to protect wilderness values or for public safety.”<sup>3</sup> While less infrastructure could lead to a more primitive wilderness experience, the minimal infrastructure present in Olympic Wilderness, as identified in the General Management Plan, is generally necessary to protect resource values and provide public safety: “most of the wilderness area, away from trails and the park boundary remains pristine with limited or no distractions from modern society where natural conditions prevail.”<sup>4</sup> In the analyses of all alternatives, we request a review for consistency with the General Management Plan, as well as an evaluation of the impacts of reducing infrastructure on natural resources and public safety.

### **Types of Recreation**

We are pleased to see the wilderness-compliant activities that our members engage in specifically listed as “Common to All Alternatives.”

### **Stock Use**

We support current approximate mileage of stock trails, stock camps and group sizes. We would like pack goats added to the definition of ‘stock.’ We support the inclusion of language about the possibility of increasing mileage of stock trails, where appropriate to provide additional dispersed recreation opportunities and/or access to new or relocated environmentally friendly sites for overnight stock camps.

### **Campsites and Camping Areas**

We support Alternative D’s approach to camping areas and campsites in Olympic National Park. We believe that the number of campsites and camping areas should stay relatively the same as present, while some might increase or decrease depending on natural occurrences and needs identified by the park. This alternative is consistent with the General Management Plan that states, “some wilderness campsites would be maintained, some could be increased, and some could be reduced in size or rehabilitated.”<sup>5</sup>

### **Commercial Services in Wilderness**

The Wilderness Act specifically calls out commercial services as appropriate in wilderness stating that they can be provided to “the extent necessary for activities that are proper for realizing the recreational

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<sup>3</sup> Olympic National Park, Final General Management Plan, Environmental Impact Statement, March 2008, page 428.

<sup>4</sup> Olympic National Park, Final General Management Plan, Environmental Impact Statement, March 2008, page 429.

<sup>5</sup> Olympic National Park, Final General Management Plan, Environmental Impact Statement, March 2008, page 429.

or other wilderness purposes of the areas.”<sup>6</sup> In other words, nothing in the Wilderness Act or the General Management Plan for Olympic National Park suggests that commercial services should only be available for those who are mobility impaired as contemplated in Alternative B. Commercial services should be viewed as an opportunity to address many of the current challenges Olympic National Park is facing with wilderness management. With declining agency budgets and a decreased presence of rangers in the backcountry, commercial outfitters play an increasingly important role in teaching visitors how to safely enjoy the backcountry and protect the resource through Leave No Trace education. More importantly, commercial outfitters provide an essential service in getting people outside, particularly youth, who may not have the equipment, experience or knowledge to do so on their own. In “A Call to Action,” the National Park Service sets a goal of “expand[ing] the use of parks as places for healthy outdoor recreation that contributes to people’s physical, mental, and social well-being.”<sup>7</sup> Commercial service providers should be viewed as partners in achieving this goal.

We support commercial services to the extent necessary as outlined in Alternative D, but in a manner that would not result in detrimental effects on natural resources or reduced opportunities for members of the general public in areas where quotas may be necessary. Ideally, commercial services can assist in reducing impacts to natural resources by incorporating wilderness stewardship, Leave No Trace, and other wilderness related curriculum into all trips as outlined in “Common to All Action” alternatives. Among the types of commercial services provided, we recommend the inclusion of youth activities as an authorized activity in Olympic Wilderness.

### **Permits**

Getting people out to experience nature is fundamental to the work of our organizations and consistent with the language and intent of the Wilderness Act. We believe that permitting is important to maintaining the character and beauty of Olympic National Park.

We support a permitting process that that does not impede recreationists’ access to the park and also has a strong educational component related to Leave No Trace, wilderness values and safety, as listed in Alternatives B, C, and D’s “Common to All Alternatives.”

We are deeply concerned that eliminating the option for self-registration will limit access to the park. The General Management Plan states that “permitting would continue under the current program.”<sup>8</sup> We oppose removal of self-registration stations unless alternatives are provided that allow for multiple ways to register for a permit (i.e. online, in-person and electronic permit station combined) with the same expediency provided by self-registration systems.

Currently, in-person registration is limited and does not easily allow for registration during the weekend and at the times when people often travel into the park, like later in the evening or early in the morning. Furthermore, the in-person registration stations are limited to only three locations in the park: Port Angeles, Quinault and Hoodsport. Any in-person permitting system should be it available seven days a week, with extended hours Friday-Sundays to allow for recreational access. Over-the-phone registration would also limit access based on hours and staff availability.

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<sup>6</sup> 16 U.S.C. § 1133(d)(5)

<sup>7</sup> A call to action, preparing for a second century of stewardship and engagement. National Park Service, 2013, page 9.

<sup>8</sup> Olympic National Park, Final General Management Plan, Environmental Impact Statement, March 2008, page 429.

We support an online permitting system that includes an online educational component analogous to approaches utilized in other National Park units<sup>9</sup> to allow access for those who cannot make it in-person during the hours the Wilderness Information Centers are staffed. We do not support an online-only registration system, as this could exclude access for members of the public who do not have internet access.

We have concerns about the varying locations and percentages for reservable quotas. We recommend that 50% of the space at each camping area be reservable, and 50% available through the permit office 24 hours before the start of a trip to create consistency and clarity among park visitors with the permit system. If specific areas are considered for a higher percentage of reservable sites, a justification and analysis needs to be provided to inform our future comments on draft alternatives.

In summary, we support the park's effort to improve the educational component of the wilderness permit registration process by requiring Leave No Trace, wilderness values and safety information. We ask that the park enhance the methods for wilderness visitors to obtain permits by incorporating a multi-faceted approach of in-person, online, and self-registration permitting systems. If executed correctly, this broad permitting system can improve the education component, reduce administrative costs, and improve visitor accessibility to Olympic National Park.

#### **Quotas and Use Limits**

Our members recognize that wilderness areas have social and ecological capacity for visitor use and that quotas can be an appropriate tool to manage the quality of the wilderness experience. At the same time, "management restrictions on visitor behavior" can degrade the opportunities for "unconfined type of recreation."<sup>10</sup> We note that the description of recreation as an element of wilderness character in the Wilderness Stewardship Plan – Preliminary Draft Alternatives Newsletter states that the quality can be degraded by "facilities... that reduce people's self reliance or manage visitor behavior." It is more than just the facilities but also "management restrictions" and the analysis of alternatives needs to evaluate this trade-off between the need to balance the reality of social and ecological carrying capacity for recreational use with the impacts of management restrictions on visitor behavior that degrade the wilderness experience.

The alternatives' statements on quotas are inconsistent with the Overarching Concept for each alternative. For example, Alternative D, which has a goal of providing a greater range of visitor experiences, would establish quotas "for overnight and day use throughout the wilderness." Alternative B, which has a goal of providing a greater range of reducing the human footprint, quotas for day use "would be considered for high use areas." We oppose the blanket application of quotas particularly if they will be implemented for day use "throughout the wilderness." Permits for day use are utilized as a management tool in only a handful of areas that include such destinations as Half Dome in Yosemite National Park and The Narrows in Zion National Park. The National Park Service has shared that the area

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<sup>9</sup> In Grand Canyon National Park for example river orientations that were previously presented by River Rangers, are now available online and visitors are encouraged to take advantage of these resources prior to arriving at the park: [www.nps.gov/grca/photosmultimedia/riv-or01.htm](http://www.nps.gov/grca/photosmultimedia/riv-or01.htm) and [www.nps.gov/features/wilderness/leavenotrace/popup.html](http://www.nps.gov/features/wilderness/leavenotrace/popup.html).

<sup>10</sup> *Keeping It Wild in the National Park Service: A User Guide to Integrating Wilderness Character into Park Planning, Management, and Monitoring*, page 9. WASO 909/121797; January 2014.

receiving the heaviest amount of use at Olympic is the coastal Wilderness.<sup>11</sup> Day use quotas may be appropriate for areas on the coast and the Wilderness Stewardship Plan should evaluate this possibility. However, any alternative that contemplates this approach needs to include specific criteria for implementing such a plan and clearly defined guidelines that limit the application of this approach to specific areas with unique resource or social issues. Day use quotas at Olympic National Park should only be used as a last resort after all other wilderness management tools have been exhausted due to its limited use throughout the National Park System and the fact that it limits opportunities for “use and enjoyment”<sup>12</sup> of the areas where such limits are imposed.

Quotas and use limits for overnight use are appropriate in high use areas when demand exceeds social or ecological capacity. As with day use areas, quotas should not be broadly applied “throughout the wilderness” but should be narrowly tailored to specific areas with unique and exceptional resource or social issues.

We acknowledge the impacts of group size on our public lands and believe in limits that work to mitigate these impacts. As such, we support the Use Limits outlined in Alternative A: “groups camping in the park backcountry...limited to a maximum of 12 persons per group; and affiliated groups whose combined total number of people is greater than 12 would continue to travel at least one mile apart.” And that “in specific backcountry areas groups of 7-12 people would continue to be required to camp in sites designated as “Group Camps.”

### **Food Storage**

We strongly encourage the continuation of current food storage options in Olympic National Park. Requiring bear canisters for all activities in the park would eliminate access for some recreationists, like paddlers, who cannot fit bear canisters in hard shell whitewater kayaks. Requiring bear canisters would also negatively impact multi-day trips and alpine ascents such as carry-over high-alpine traverses and bivies. We believe that permit holders should be required to use proper food storage as currently outlined in the Camping and Food Storage section of the Superintendent’s Compendium; that bear canisters, bear wires, bear hangs and rodent-proof food containers can all be proper food storage, location dependent; and that the park can increase education around bear issues to negate concerns about the possible future habituation of bears in Olympic National Park.

### **Waste Management**

We support efforts to minimize the impact of human waste. Overall we support the ideas of Alternate A that are consistent with the General Management Plan. As recreationists, we seek to leave areas better than when we arrived. Based on this, we support waste management practices that include packing out human fecal waste in blue bags from any glaciated area of the park. We also support the evaluation of visitor use management strategies and new options for toilets as well as increased educational efforts as outlined in “Common to All Alternatives.” When evaluating new options for toilets, it is also important to determine whether current types of toilets are appropriate for the areas they serve (for example, composting toilets are often not realistic for high use areas or areas where regular maintenance is not available).

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<sup>11</sup> According to park staff, 50% of the park’s use is located in coastal wilderness. May 5, 2014 meeting with Olympic National Park staff.

<sup>12</sup> 16 U.S.C. § 1131(a)

### **Campfire Restrictions**

We believe that campfires can be an inspiring part of backcountry experiences and should be allowed in Olympic National Park. Similarly to Alternative B, we suggest that campfires be prohibited above 3,500 feet due to the fragile nature of alpine environments. We support the park in being able to assess resource impacts below 3,500 feet, but we request more detailed language around what “exceeding acceptable standards” means.

### **Maintenance of Trails, Bridges, or other Existing or Necessary Infrastructure**

When Olympic National Park was designated in 1938, the expressed intent was "to maintain the park for a principal use as a trail park."<sup>13</sup> We believe that having a maintained trail system does not negatively impact the wilderness character of the park. Furthermore, we appreciate the sentiment provided in the document *Keeping It Wild in the National Park Service* that states:

*“Wilderness is not intended to be an area of prohibitions that limits access and enjoyment, and facilities in wilderness are important aspects of visitor safety, experience, and resource protection.”<sup>14</sup>*

We are strongly opposed to any reduction in mileage or maintenance of the trail system. This issue was evaluated during development of the General Management Plan and draft language that “the number and class of trails would be slightly reduced from present” was struck from the final document.<sup>15</sup> We feel that the language of ‘no new trails will be constructed’ limits the ability of the park to account for future trends. With growing local and regional populations, as well as a growing number of park visits, we want to ensure the trail system is appropriately supported well into the future. We do recognize that some trails may need to be relocated due to environmental or habitat considerations, but the lack of available current maintenance funding alone is not sufficient reason to permanently close a trail or trail system.

We request an alternative that maintains the complete current trail system, continues the maintenance of bridges, and allows for increases in the maintenance status of trails. We support and request options that allow for more maintained trails in the park, including the possibility of bringing back abandoned trails into the maintained trail system.

Under the Facilities Maintenance: Trails category, we agree with Alternative D, in adherence with the Wilderness Act and the Minimum Requirements Analysis.

For Facilities Maintenance: Bridges/Water Crossings, we believe that bridges, foot longs and water crossing are integral features of trail and allow the public to access wilderness. We believe that these features should continue to be installed and replaced as needed and as outlined in Alternative A.

We believe it is important for the park to be able to improve how routes are signed, and request an alternative that allows for the inherent changes that happen in a wilderness environment, which may

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<sup>13</sup> 1938 "Statement of Controlling Development Policies", OLYM-621, page 3

<sup>14</sup> *Keeping It Wild in the National Park Service: A User Guide to Integrating Wilderness Character into Park Planning, Management, and Monitoring*, page 83. WASO 909/121797; January 2014.

<sup>15</sup> Olympic National Park, Final General Management Plan, Environmental Impact Statement, March 2008, page 428.

require an increase in route signage. Right now all three proposed alternatives would either reduce or keep signage as is, which could be limiting and impact the safety of visitors in the future.

We support the “Common to All Alternatives” recommendation around ABA Trails and Access.

We highly encourage the park to continue utilizing regional organizations that provide integral trail maintenance to the park. For example, Washington Trails Association, Back Country Horsemen of Washington and Student Conservation Association, as well as other smaller organizations, have provided thousands of volunteer hours to maintaining the park’s trail system. We applaud Olympic National Park for meeting their 2016 National Park Service Centennial Plan for increasing volunteer service by 10% per year from 2006-2016, and we look forward to supporting a further continuation of this trend.

### **Cultural Resources Management in Wilderness**

We believe that historical structures play an integral role in experiencing wilderness here in the U.S. We oppose Alternatives B and C, as they are inconsistent with mission of the National Park Service, current 2006 National Park Service policy and Olympic National Park’s 2008 General Management Plan. In addition, National Park Service policy clarifies and confirms its intent to maintain structures in wilderness in its January 2014 National Park Service publication, *Keeping it Wild in the National Park Service – A User Guide to Integrating Wilderness Character into Park Planning Management and Monitoring*.

We support the language and ideas outlined in Alternative D, and believe that the Minimum Requirements Analysis can and should be used to maintain historical and cultural resources.

### **Summary**

Olympic National Park is the fifth most-visited national park in the country with more than three million visits per year (2013). People come from all over the world to visit Olympic National Park which has a tremendous positive impact for the local economies and communities surrounding the park. There are few places in the world where you can visit coastal, rainforest and subalpine wilderness in one trip. In short, Olympic National Park is an American treasure. With over 95% of Olympic National Park designated as wilderness, one can assume that almost everyone who visits the park either steps into or takes in the dramatic vistas of Olympic Wilderness. While our organizations are committed to protecting the last remaining wilderness in Washington state, we are equally committed to ensuring people can access and enjoy Olympic Wilderness in a variety of ways, from hiking to a mountain meadow, to climbing a rugged and remote peak, to paddling world-class whitewater, and horseback riding up a river valley floor, now and into the future.

To summarize:

- We do not support limiting recreational access to Olympic National Park or reducing the maintained trail system.
- We do support the concept of Alternative D in placing an emphasis on “managing visitor use and recreation to provide visitors with [a] greater range of wilderness experiences.” However we find that many of the recommendations for Alternative D appear to be inconsistent with the stated emphasis and with the park’s 2008 General Management Plan.
- We support the idea of Wilderness Zones, but request clarity on the process to determine zones.

We encourage Olympic National Park to continue looking for ways to balance the needs of retaining and improving the park's wilderness character with the needs of those who love and want to enjoy Olympic National Park Wilderness – the two needs can and should live harmoniously together.

Thank you again for the opportunity to provide feedback on Olympic National Park's Wilderness Stewardship Plan – Preliminary Draft Alternatives.

Sincerely,

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