



October 10, 2017

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

RE: Comments on the Draft Olympic National Park Mountain Goat Management Plan/Environmental Impact Statement (EIS), Alternative D (Preferred Alternative).

*Submitted via NPS PLanning, Environment, and Public Comment website:
<http://parkplanning.nps.gov/olyngoat>*

Dear Ms. Creachbaum:

Thank you for the opportunity to comment on the Draft Olympic National Park Mountain Goat Management Plan/EIS.

The undersigned organizations represent over tens of thousands of Washingtonians who recreate in the Olympic and North Cascades mountains. Our members are frequent visitors to these special places, enjoying opportunities for hiking, climbing, whitewater rafting, backcountry skiing and mountain biking. These recreation opportunities are important to our lifestyle and Washington's heritage. The proposed Goat Management Plan, and the preferred Alternative D, seeks to remove the non-native population of mountain goats currently inhabiting Olympic National Park and Olympic National Forest by relocating approximately 50% of that population to sites in the North Cascades Mountains and lethally removing 40% of the population. The proposed activities will take place in popular recreation areas and will impact recreational access and trails.

Our organizations provide the following comments as they pertain to the Draft Olympic National Park Mountain Goat Management Plan/EIS, Alternative D: Combination of Capture and Translocation and Lethal Removal (Preferred Alternative).

Impacts to Recreation

The proposed Alternative D will have numerous impacts to recreation opportunities as a result of the timing and location of proposed management activities and impacts to the wilderness soundscape. The proposed management activities, under Alternative D, will impact popular recreation areas in the Olympic National Park, Olympic National Forest and the North Cascades mountains.

Location of Management Activities

Impacts to recreation areas in the Olympic mountains include Mt. Ellinor Trail/Trailhead, Hurricane Ridge, Dosewallips Trails, Elwha Trails, Sol Duc Trails, Dungeness River Trail and Deer Park. Of particular note, the Mt. Ellinor Trail is one of the most popular trails in the Olympic National Forest and had nearly 11,000 visitors in 2015¹. In fact, the Mt. Ellinor Trail is one of the most popular trails in the entire state, ranking high on Washington Trail Association's (WTA's) top 100 most viewed hikes via WTA's online hiking guide and Mountaineers volunteers lead over 19 trips there in 2017 alone. The Mt. Ellinor Trailhead is proposed for use as a staging area and as a result would be closed to visitor use during management activities, which would impact both the Mt. Ellinor Trail and adjacent trail system. Similarly, the Hamma Hamma staging area is located near trailheads and frontcountry campgrounds, which would be impacted by temporary closures during management activities. The temporary closure of the Mt. Ellinor Trailhead and Hamma Hamma staging areas would directly impact day hikers, backpackers, climbers and campers.

Impacts to recreation areas in the North Cascades mountains include La Rush/Bear Lake Trail, Curry Gap Trails, Independence Lake Trailhead, Elliott Creek/Goat Lake Trailhead, Green Mountain Lookout/Trail, Headlee Pass Trail, Snowy Lakes (near the Pacific Crest National Scenic Trail), Stillaguamish Peak, Whitechuck, Kaleetan Peak and Vesper Peak. Of particular note, the Goat Lake Trail is one of the most popular trails in the North Cascades, also ranking high on WTA's top 100 most viewed hikes via WTA's online hiking guide. In addition, a number of the popular backpacking and climbing areas are in proximity to proposed mountain goat release sites including, Snowy Lakes, Whitechuck, Kaleetan Peak and Vesper Peak and would be impacted by the proposed management activities. The Draft Plan calls for 12 staging areas in the North Cascades mountains where mountain goats will be received. These staging areas are located near roads and trailheads where visitor use may be high². As a result, the wilderness experience for recreation visitors will be impacted both visually (e.g. helicopters, reduced vegetation, additional management staff traffic) and acoustically (e.g. helicopters, staging area equipment, additional management staff traffic). These proposed management activities in the North Cascades will directly impact day hikers, backpackers, climbers and horseback riders.

Timeframe for Management Activities

Under Alternative D, management activities in both the Olympic and North Cascades mountains will occur twice each year for two week periods during late summer (July-September). Initial management activities are planned to last up to five years with additional maintenance occurring for up to 15 years. The late summer timeframe proposed for management activities is also prime recreation season, when visitor use is highest. This is true for both Olympic and North Cascades mountains. In 2015, recreational visits to the Olympic National Park were highest June-September, peaking in August at over 700,000 visitors³. The Park also had the greatest number of backcountry campers from July-September, peaking in August at over 23,000 visitors⁴. Similarly, in the North Cascades National Forest lands, the majority of recreational visits occur July-September, reaching an estimated 8 million recreation visitor days annually⁵. Conducting management activities during this timeframe will have the greatest impact on recreation users. Our organizations appreciate the inclusion of several provisions that seek to reduce

¹ National Park Service. Draft Mountain Goat Management Plan/Environmental Impact Statement. P. 106.

² National Park Service. Draft Mountain Goat Management Plan/Environmental Impact Statement. P. 122.

³ National Park Service. Draft Mountain Goat Management Plan/Environmental Impact Statement. P. 102.

⁴ National Park Service. Draft Mountain Goat Management Plan/Environmental Impact Statement. P. 102.

⁵ National Park Service. Draft Mountain Goat Management Plan/Environmental Impact Statement. P. 121.

impact to recreational users, and would recommend the addition of several other provisions as outlined below.

We appreciate the inclusion of several provisions to inform recreation users and reduce impacts including:

- Typically, only one release site in the North Cascades mountains would be used at a time.
- Duration of trails/trailhead closures would be reduced when feasible to one day to one week (although closures could last two weeks).
- Mountain goat capture or lethal removal activities via helicopter would be aborted if humans are observed in the immediate area.
- Advanced notification of closures will be posted at trailheads.

Our organizations request the below modifications that will reduce impacts on recreation users:

- Adjusting the proposed time of year for management activities to occur either earlier or later in the year, outside of the prime recreation season (July-September).
- Only conduct management activities during the weekday, when visitor use is lowest, in order to reduce impacts on recreation users.
- Do not conduct management activities on holidays or popular holiday weekends (e.g. Labor Day weekend).
- Analyze release sites for potential negative human-goat interaction impacts and determine alternate release sites for these high visitor use areas. For example, the Snowy Lakes release site is a popular backcountry hiking, camping and climbing area. Releasing goats that may be habituated to humans could increase the likelihood of potentially negative human-goat interactions.

Impacts to Soundscapes

The natural soundscape of a [national] park is defined as: “the combination of all of the natural sounds occurring in the park, absent the human-induced sounds, as well as the physical capacity for transmitting those natural sounds.”⁶ Experiencing the natural soundscape is a fundamental element of enjoying a national park or forest. This is even more true for visitors to nationally designated wilderness areas. The Draft Plan/EIS recognizes the importance of soundscapes for the recreational experience, stating:

“Natural sound and the opportunity to experience solitude are valued components of the visitor experience with the park and the national forest. The wilderness qualities of a backcountry experience in particular include the ability of visitors to enjoy uninterrupted solitude and natural sounds.”⁷

Under Alternative D, the soundscape in both the Olympic and North Cascades mountains would be negatively impacted. Impacts would occur as a result of staging area activities, helicopter flights, and use of firearms (Olympic mountains only). Furthermore, the impact to the soundscape is the longest under Alternative D, due to the use of combined management practices⁸. Impacts to the acoustic environment would be allowed for up to 8 hours a day throughout both the two-week management periods. As a

⁶ National Park Service. Draft Mountain Goat Management Plan/Environmental Impact Statement. P.97.

⁷ National Park Service. Draft Mountain Goat Management Plan/Environmental Impact Statement. P.97.

⁸ National Park Service. Draft Mountain Goat Management Plan/Environmental Impact Statement. P.185.

result, visitors near the project areas during each two week management period would be significantly impacted. Given, that the proposed two week management activities are scheduled to take place during peak visitation in both the Olympic and North Cascades mountains, the impacts would be significant. The anticipated impacts to the soundscape for visitors lends additional support for adjusting the proposed timeframe for management activities, to outside of the prime recreation season, so as to minimize impacts on recreation users.

Conclusion

Our organizations recommend, where feasible, adjusting the timing and location of proposed management activities to reduce the impacts to recreation areas and users related to both temporary closures of recreation areas and impacts to the wilderness soundscape.

Thank you for considering our comments on the Draft Mountain Goat Management Plan/EIS. Our organizations appreciate the time and effort the National Park Service, National Forest Service, and Washington Department of Fish and Wildlife has dedicated to developing the Management Plan/EIS. Our organizations believe this Plan could be improved through adjustments related to timing and location of management activities. We would welcome the opportunity to participate in further discussions around the location of management activities.

We look forward to continued involvement in this project as it develops. Please let us know if you have any questions or if we can be helpful.

Sincerely,

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