



October 5, 2017

Sarah Creachbaum
Superintendent,
Olympic National Park
600 East Park Avenue
Port Angeles, WA 98362
Transmitted via electronic form and email (Christina_Miller@nps.gov)

RE: Draft Olympic National Park Mountain Goat Management Plan

Dear Ms. Creachbaum:

The undersigned conservation, recreation and wildlife organizations represent tens of thousands of members who recreate in the Olympic and North Cascades Mountains. These wild places and the wildlife, recreation and ecosystem benefits associated with these upper watersheds are an important part of the quality of life that we all enjoy as Washington State residents. Additionally, wildlife populations, including mountain goats, are particularly important spiritually and culturally to several tribes in northwest Washington.

We are writing to support the Olympic National Park's preferred alternative (D) which would include live capture and translocation of mountain goats from Olympic National Park and Olympic National Forest to federal lands in the North Cascades including Mt. Baker-Snoqualmie National Forest and the Okanogan-Wenatchee National Forest. This alternative also calls for lethal removal of additional non-native mountain goats on the Olympic Peninsula by shooting.

Purpose and Need of the Project

We support the stated purpose and need of the project. The project stands to provide solutions to two problems related to wildlife mountain goat management and visitor safety issues with one action.

First, mountain goats are not native to the Olympic Peninsula and were introduced to the Olympic Mountains prior to the establishment of the national park. Management of this exotic species centers around ecological impacts to sensitive vegetation and native plant communities, soil erosion at high elevations and displacement of native species from habitat. Additionally, human mountain goat encounters (with potentially fatal consequences) are a growing concern in areas of high use within Olympic National Park. Mountain goats have a high affinity for salts and associated minerals throughout their native range. However, there are no natural sources of salt in the Olympic Mountains and mountain goats have learned to seek salts from humans (i.e., sweat, urine, food).

Second, mountain goats are native to the North Cascades but suffered a steep decline in the 1980's due to over harvest and habitat fragmentation. Despite significant areas of unoccupied habitat and stronger management of tribal and non-tribal harvest restrictions, goat populations in the North Cascades have not recovered. Concerns about inbreeding in some of the existing populations are increasing. Furthermore, mountain goats are a symbol of the Pacific Northwest alpine wilderness and have always been prominent in tribal culture. Historically, mountain goats were an important food resource for the tribes who traditionally used their wool, horn, and bone to make clothing, blankets, tools, and ceremonial objects. Furthermore, subsistence hunting and wool collection were historically important elements of tribal culture and a means of inter-tribal commerce amongst many tribes.

This project represents an opportunity to both address the impacts and conflicts of the non-native mountain goats in the Olympic Mountains while also supporting the recovery and health of native populations of goats in the North Cascades. Furthermore, the project is backed and supported by funding, expertise and cooperation by federal, state and tribal managers of goat or goat habitat areas in Washington State. These include the U.S. Park Service, U.S. Forest Service, U.S. Fish and Wildlife Service, Washington Department of Fish and Wildlife and the Tulalip, Stillaguamish and Sauk-Suiattle Tribes among others.

Support for Alternative D

The draft Environmental Impact Statement (EIS) proposed and studied a No Action Alternative (A) and three action alternatives (B, C & D) to meet the stated purpose and need.

Alternative B (Capture and Translocation Only) would focus exclusively on capturing all goats in the Olympic Mountains and moving them to suitable sites in the North Cascades. During the 1980's, efforts by the U.S. Park Service to achieve this same goal through only translocation failed to eliminate the non-native goat population in the Olympic Peninsula or significantly impact the recovery of native mountain goat populations in the North Cascades. Based on the EIS, only 50% of the non-native goats will be captured and translocated, failing to achieve the purpose and need of the project.

Alternative C (Lethal Removal Only) would focus exclusively on using shotguns or high-powered rifles on foot or from helicopters to reduce or eliminate mountain goats from the park and adjacent Olympic National Forest. While the EIS suggested that as much as 90% of the non-native goat populations could be removed, this alternative offers no benefit to the recovery of native mountain goat populations in the North Cascades. This alternative poses the same or similar impacts to visitor use and Wilderness experience as the other action alternatives.

Alternative D (Capture and Translocation Combined with Lethal Removal) is the preferred alternative and would combine both tools to address the impacts of non-native goats in the Olympic Mountains while supporting recovery of native mountain goats in the North Cascades. We feel that Alternative D has the most promise of providing the most benefits with the highest level of success compared to the other alternatives studied in the EIS.

Suggested Adjustments to Alternative D

We propose the following substantive modifications to Alternative D in the Final EIS:

- I. Reduce the timeframe for capture and translocation before transitioning to lethal removal

We believe that 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 may be 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.

As a result, 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. The goal is to avoid 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). This would still achieve the purpose and need of the project and address impacts from non-native mountain goats in the Olympics while assisting recovery of native mountain goat population in the North Cascades.

II. Mitigate impacts to Wilderness and recreational uses

Our organizations are deeply committed to preserving the wilderness values and characteristics of the public lands the United States Congress has included in the National Wilderness Preservation System for current and future generations. We understand that future support for our nation's special places is largely reliant on a citizenry that is actively engaged in experiencing and enjoying these lands. Wilderness designation provides the highest level of protection for ecological and recreation values into the future and it is critical that current and future generations have the opportunity to experience Wilderness first-hand to understand and support the continued protection of Wilderness.

Our understanding is that the agency is developing a minimum requirement analysis (MRA) with a recommendation to use a limited number of helicopter flights in order to help capture or shoot mountain goats within designated Wilderness areas in Olympic National Forest and Olympic National Park.

We do not take lightly the use of the exception in the Wilderness Act that would allow the use of motorized equipment. We regard the use of the agency's discretion under the Wilderness Act as something to be considered carefully on a case-by-case basis. Based on MRA provided in the appendix of the draft EIS, we feel that a limited use of helicopter flights is acceptable in this instance to achieve health and safety of park employees and visitors and preserve the long-term wilderness character of the area.

It seems clear that the translocation of goats from the Olympic Mountains and to the appropriate sites in the North Cascades will require helicopter use. We appreciate that the disturbance to visitors or wilderness values will be limited to two week periods in July, August and September. We would also suggest that these potentially disruptive management activities be limited to week days, rather than weekends where the visitation is likely the greatest.

We appreciate that all helicopter staging areas will be located outside of designated Wilderness areas. These staging areas will have the most impact on the ground and with respect to concentrated motorized use. We also appreciate that management activities will be scheduled to avoid creating adverse resource impacts or conflicts with visitor use.

We would suggest that trail closures be limited in duration as much as possible and be focused on week day or lower volume recreation times to create as little user conflict as possible.

The Draft EIS fails to describe any restoration activities that might be accomplished by the Park following mountain goat removal from Olympic National Park. Please consider identifying and planning restoration activities to areas that have been damaged over the years by mountain goats. A comprehensive restoration plan should be developed and the environmental impacts of field activities and the minimum requirement analysis should be included in the Final EIS.

Thank you for the opportunity to share our perspective on this project.

Sincerely,

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