



*“Promoting Birding and Conservation as Community Educators,  
Volunteers, and Stewards”*  
P.O Box 502 Sequim, WA 98382

September 21, 2017

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

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

Dear Superintendent Creachbaum,

Olympic Peninsula Audubon Society (OPAS) welcomes the opportunity to comment on Olympic National Park's Mountain Goat Management Plan Environmental Impact Study (EIS). Several OPAS Board members attended a community meeting August 15, 2017 in Port Angeles regarding the four alternatives proposed in the EIS. We appreciate the comprehensive information provided by representatives of the Park Service, Forest Service, and the Washington Department of Fish and Wildlife.

We subsequently reviewed the EIS and we offer our support for the Park's preferred Alternative D, Combination of Capture and Translocation and Lethal Removal. Alternative D meets the purpose and need for action and allows the NPS to reduce or eliminate impacts to park resources from mountain goats, which includes interference with natural processes, native species, and natural habitats, while reducing potential public safety issues associated with the presence of mountain goats in the park. We provide one stipulation that the goal of this alternative emphasizes total removal of all non-native mountain goats from ONP and adjacent Forest Service lands.

In addition, we express concerns with this alternative's time frame to capture and translocate mountain goats during years 1 and 2, with decreasing feasibility or need in years 3, 4, and 5. The EIS suggests that some lethal removal could occur as early as the second capture bout in year 1, but only for those mountain goats that are determined to be uncatchable. We strongly encourage that the agencies switch to lethal removal simultaneously with capture and translocation after the first year to avoid longer periods of helicopter and ground activity in the Park and Wilderness areas. Other concerns over the longer time frame include the potential loss of funding for the project, increased safety risks to personnel, and negative impacts to birds and other wildlife by prolonged air and ground activity.

Scientific studies show decades of adverse impacts to ONP's endemic vegetation by the grazing, trampling, and soil disturbance of mountain goats. These behaviors affect the relative abundance of plant species, alter interspecific competition, and degrade habitat for sensitive subalpine and alpine plant communities. Moreover, mountain goats consume underground plant structures, including fern

rhizomes, roots, bulbs, and tubers. The evidence is indisputable that the introduction of exotic species causes a multitude of adverse impacts to native species populations and the living systems that support them.

Although wildlife biologists with the Forest Service, NPS, and WDFW evaluated all potential staging areas in the National Forest to ensure that those areas would not occur adjacent to suitable habitat for endangered Northern Spotted Owls or threatened (Washington State endangered) Marbled Murrelets, we request that the agencies take protective measures with management activities that include the Sweets staging area that is very close to potential habitat for the Northern Spotted Owl. Further, we advise implementing cautionary measures with the two southern staging areas proposed in Olympic National Forest, Mt. Ellinor and Hamma Hamma, that occur within areas mapped as critical habitat for the Northern Spotted Owl and the Marbled Murrelet.

The proposed action could adversely affect nesting Marbled Murrelets during the breeding season (April 1 through September 23), due to noise disturbance and human activity. Adverse effects from noise disturbance during the nesting season are of concern due to the potential to interrupt optimal nest selection, feeding attempts, or incubation success. To minimize noise disturbance and rotor wash effects, the EIS recommends that helicopter flight paths will be at least 500 feet above suitable habitat. Also, if any individual Marbled Murrelet is observed during project operations, a Forest Service wildlife biologist would be notified and measures to minimize or eliminate harassment would be applied. Curtailing helicopter activities in the early mornings and late evenings during murrelet nesting season is extremely important for successful chick survival.

OPAS fully supports the use of non-toxic ammunition during lethal removal activities. Lead ammunition is toxic to humans, birds, and other wildlife. If the NPS pursues the option to train volunteer hunters to assist with goat removal, hunters must adhere to strong guidelines that require proper methods, equipment, and backcountry practices, including hauling out carcasses where feasible.

Once mountain goat removal is accomplished, we suggest that the Park Service consider an ongoing post-mountain goat analysis of the native plant and animal community to record and measure the changes that may occur to species previously impacted by mountain goat activity.

We look forward to the future restoration of an ecological balance of living systems in Olympic National Park by the removal of non-native mountain goats.

In addition to our comments, we support the comment letter by Olympic Park Associates and ask that you review and consider their letter carefully.

Sincerely,



Robert Phreaner  
President, Olympic Peninsula Audubon Society