

Olympic Park Associates

April 23, 2019

Acting Superintendent Lee Taylor
Olympic National Park
600 E. Park Avenue
Port Angeles, WA 98382

Re: ONP Fire Management Plan Environmental Assessment
(Comment submitted electronically to PEPC site 4/23/19)

Olympic Park Associates commends the park service on a comprehensive and well-reasoned fire management plan (FMP). It will bring wildfire management policies in Olympic to a level that should become the standard for the National Park Service. Given the onset of global warming, the change in fire regimes leading to more frequent and extensive natural fires over the past decade, changes in NPS wildland fire policy, and the 2005 fire plan's failure plan to adequately address these issues, the new plan is necessary and timely.

The purpose and need for action is clear, and the plan's goals and objectives are laudable. We strongly support the goals of public and firefighter safety; restoring the role of natural fire to forest ecosystems; protecting resources; managing fire "to preserve the tangible and intangible qualities of wilderness character"; and reducing fuel near non-wilderness structures. All are vast improvements over the current (2005) FMP. We also support coordination with other agencies, an essential component for all stated goals.

The plan's preferred alternative (B) offers an informed, sensitive, and comprehensive approach to fire management in the park. We applaud the plan's designation of wilderness and non-wilderness fire management units, another major improvement over the earlier plan. It is unfortunate that this plan, too, is developed without the overall guidance of a wilderness stewardship plan (WSP). Although we understand that actions taken in wilderness will be evaluated by minimum requirement analyses, we have a particular concern regarding the programmatic minimum requirement analysis (PMRA) discussed in Appendix E.

It is our understanding that PMRA will be employed across the board until an approved wilderness stewardship plan is in place. In the current draft, the PMRA calls for "point protection" of wilderness infrastructure (ranger stations, cabins, shelters, toilets, bridges, signs) that may be at risk during fires. Protection measures include vegetation clearing (fuels treatment). Specifics include removing trees up to 16-inch diameter breast height (dbh) in an area up to 30 feet around structures (Appendix E, Structure Protection, pp.E37-38).

In the absence of a WSP, which will determine the value of specific structures in wilderness and assess whether they merit preservation and maintenance, we submit that implementing this action degrades wilderness character, preempts the WSP, and is beyond the scope of the FMP.

Decisions regarding extensive forest clearing and development of defensible space around structures in wilderness must be guided by a publically reviewed NEPA-approved WSP. Including this measure in the FMP undermines that process and compromises an otherwise commendable plan.

We appreciated the opportunity to discuss various aspects of the EA with park planning, fire management, and support staff at public meetings held in April. The discussions were informative and clarified many aspects of the plan.

Thank you for the opportunity to comment on the draft EA; we hope you find our comments helpful in completing the final plan.

Tim McNulty
Olympic Park Associates