



Olympic Park Associates

168 Lost Mountain Lane, Sequim, WA 98382. Phone 360-681-2480.

July 16, 2018

Hood Canal District Ranger Yewah Lau
c/o Dana Butler, Olympic National Forest Supervisor's Office
1835 Black Lake Blvd. SW,
Olympia, WA 98512

Re: OPA Comment on *Dungeness Watershed Roads Management Preliminary EA*. Letter ID **49643-2546-38**

Thanks for the opportunity to comment on this project. As a major fisheries and water supply stream, a Tier 1 Key Watershed, and an increasingly important recreation destination for an expanding population both local and regional, the Dungeness watershed is critically important to us. Olympic Park Associates (OPA) has advocated many of the proposed actions in your preferred alternative through our participation in the Dungeness Watershed Action Plan and other planning efforts dating back to the Canal Front land use plan of the mid-1970s. We commend the Forest Service on an excellent plan. It represents a sound investment in the future health and integrity of the Dungeness watershed.

OPA supports all aspects of Alternative A, including the decommissioning and storage of unneeded, unstable, or erosion-prone roads listed. Storage is an excellent option in this time of uncertain funding. We also support the 1.4 miles of road-to-trail conversion for the 2870-230 spur and relocating and improving the Lower Dungeness and expanding Tubal Cain trailheads. Additional information in the EA prompts us to recommend including the seasonal closure for the 2870-270 road (proposed in Alternative B) to protect critical habitat for the federally endangered Taylor's checkerspot butterfly.

These actions will not only protect streams, tributaries, and the Dungeness River from ongoing sedimentation and fish habitat destruction, they will protect remote backcountry areas and sensitive wildlife habitats from incursion by illegal and destructive motorized use by ORV/ATVs, trash dumping, random shooting, and unauthorized trail construction.

Having been part of the process, OPA strongly supports the Dungeness Watershed Action Plan's decision to decommission the upper 2870 road beyond the Tubal Cain/Dirty Face Ridge trailhead. Motorized access has encouraged

increasingly heavy use of the Silver Lakes way trail, a poorly sited short cut to Silver Lakes in the Buckhorn Wilderness. This access (and the route's promotion on web sites) has led to overuse, trampling, unburied waste, and illegal fires in the subalpine lake basin. All have severely impacted the wilderness character of the area. OPA has long advocated this road closure, and the Forest Service agreed in its 1978 Canal Front Land Use Plan. We are encouraged to see the agency finally taking action. We fully endorse the preferred alternative's approach to decommission this road section without trail conversion and ask that you resist pressure to store it or convert it to trail. The existing way trail traverses wetlands, creek banks, and steep erosive slopes adjacent to Silver Creek, which is subjected to resource damage from heavy use. A good trail to this area (No. 842) exists from the Mount Townsend and Dirty Face Ridge trails.

As we mentioned in our scoping letter, we request you extend the decommissioning of the 2875-150 road north to the Lower Gray Wolf subwatershed. Decommissioning this additional portion of the 150 spur (along with the proposed 155) would enhance the restoration of this important and accessible wilderness valley.

One area we would like to see the preferred alternative extended would be the short 2877- spurs, 100, 140, 150, and 160, where numerous tributaries to McDonald Creek and the Pat's Prairie botanical reserve are threatened by ORV/ATV use. We ask that all decommissions and storage closures be designed in ways that insure future ORV/ATV users cannot gain access.

OPA is heartened that Olympic National Forest is embarking on this long-planned project. We express our gratitude to Forest staff, current and past, who have worked to arrive at this point. We look forward to seeing these restoration projects fully funded and undertaken soon.

Sincerely,

Tim McNulty
Olympic Park Associates

cc. U.S. Representative Derek Kilmer
Rep. Steve Tharinger
Rep. Mike Chapman