

To: Superintendent Sarah Creachbaum, Olympic National Park
From: Tim McNulty, Olympic Park Associates
Re: Olympic Hot Springs Road Long-Term Access/Environmental Assessment.
Supplementary comment, March 10, 2019

OPA appreciates the extended comment deadline for this project. We also very much appreciate the opportunity to meet with you, members of your staff, and Kirk Loftsgaarden of FHWA and to visit the project site on March 6. We value the frank and open discussion, information provided, and exchange of ideas. We extend our thanks to everyone involved.

We wish to append these additional comments on the project in light of information shared in that discussion.

As mentioned in our earlier correspondence, OPA considers an environmental assessment (EA) with its limited six-month timeframe and 75-page limit (as specified by the deregulatory Secretarial Order 3355) inadequate to review and assess the environmental impacts of a project of this size and scope. Following the field trip, information regarding the nature of the (clay) soils involved, the number of old-growth and potential marbled murrelet habitat trees in the possible clearing corridor, and the scale of structures such as the retaining wall at Sanders Fork required to facilitate a bypass road has confirmed our assessment. We believe these and other issues require full analysis and consideration in an environmental impact statement (EIS).

Regarding preliminary alternatives offered prior to project scoping, we believe the one-mile bypass road is the only one that will meet the projected purpose and need for the action: restoring motorized access to the upper valley. While we support this goal, our overriding concern is that the new bypass road be designed and constructed to minimize impacts to both the river, its fisheries, and to the mature and old-growth forest that covers the route.

We understand the existing route and road design are preliminary. So we would like to recommend that the design and engineering offered in the NEPA document reflect a scaled-down, low-speed bypass road consistent with the existing Olympic Hot Springs Road. We recommend that the bypass alternative(s) offered in the NEPA document incorporate the following features:

- * reduce the paved surface width to 20 to 22 feet from the current 26-foot width as presented at the Port Angeles public meeting and depicted in the driving animations;
- * conform the road as close to natural slope contours as possible to encourage and enhance the experience of driving slowly through an old forest;
- * reduce cuts and fills and incorporate structures to preserve as much of the

surrounding forest as possible, with special attention to preserving as many of the 42 old-growth, potential murrelet platform trees (2.5- to 6-foot diameter) as feasible;

- * explore options for reducing the 700-foot-long retaining structure at the Sanders Fork; even with fish habitat structures incorporated, that has to pose a significant impact on that portion of the restored Elwha River;
- * survey upper Sanders Creek and tributary streams along the proposed route for the presence of anadromous and resident fish;
- * include and fund a plan to revegetate disturbed areas, cuts and fills with native vegetation;
- * be attentive to historic sites identified by Russ Dalton in his comment letter (submitted 2/22/19), and minimize impacts to these cultural resources.

Given these and many other considerations to be addressed in a planning document for the bypass road, we question the practicality of combining this project with the overall rehabilitation of the entire 8.5-mile length of the Olympic Hot Springs Road. We understand from our March 6 discussion that the bypass and existing road rehabilitation will be completed with funds from separate sources. Perhaps the planning processes should be separated as well. This would allow more attention to be paid to details associated with new road construction in a sensitive environment and provide an opportunity to review the level of rehabilitation necessary for the remainder of the Olympic Hot Springs Road.

Thank you for the opportunity to share preliminary thoughts on this project. We look forward to expanding on these during the scoping phase of the NEPA process.