



To: Superintendent Sarah Creachbaum, Olympic National Park  
From: Olympic Park Associates  
December 10, 2019

Re: Olympic Hot Springs (Elwha) Road Access Environmental Assessment.

Olympics Park Associates (OPA) wish to share the following comments on the Elwha Road Environmental Assessment (EA). As stated in earlier correspondence, we endorse the purpose of this action, "...to restore public and administrative road access to visitor and administrative use areas that are currently inaccessible due to washouts." However, the scale of the action as outlined in the preferred alternative and its projected impacts to park resources cause us to question whether it supports the long-term goals of the Elwha River ecosystem restoration. We find that the information provided in the EA is insufficient to allow us to evaluate either of the action alternatives: 2, realignment, or 3, grade raise.

During the scoping phase for this project and in our response to preliminary alternatives OPA requested a comprehensive environmental impact statement (EIS) be undertaken to evaluate the environmental costs of a project of this size and scope. We feared the limited EA and accelerated timeframe required by the current administration would fail to adequately consider the full environmental costs of the project or prescribe adequate mitigation. A "finding of no significant impact" for the preferred alternative, scheduled five months from the release of the EA, strikes us as unwise and unworthy of the extraordinary ecological restoration undertaken for the Elwha River watershed.

We find the current EA fails to adequately addresses some critical issues regarding new road construction in this sensitive area. The issues that most concern us are: 1) future road washouts downstream of the project area; 2) the destructive consequences 1,000 or more feet of retaining wall will inflict on river dynamics and aquatic habitats for recovering salmon stocks; 3) the lack of mitigation for removal of 18 acres of mature and old-growth forest habitat, including up to 50 potential marbled murrelet nesting trees and their surrounding habitats; and 4) the expressed need for further geotechnical testing while the project moves ahead.

All merit further study, consideration, and public review.

OPA submits that a construction project of this size, located in a top-tier National

Park, a UNESCO World Heritage Site, and in the heart of the largest salmon restoration effort in the U.S. demands a much more considered approach. Fast-tracking the project to restore motorized access to the upper valley by 2023 is not in keeping with the multi-decade effort to restore the Elwha River ecosystem.

Our primary concerns are as follows:

1) We find that inadequate consideration is given to the lower section of OHS Road in vicinity of Park boundary, Madison Creek, and Sweets Field. This section of road parallels the active main channel of the river. It has washed out twice by natural river action during floods and is prone to future washouts. Washouts in this area or in Sweets Field would render a bypass road unusable. A new bypass around Sweets Field would traverse highly unstable slopes. The EA fails to fully evaluate this risk or pose a course of action to resolve long-term access. A broader look at the larger picture is needed.

2) The EA describes a series of up to 10 walls or structures along the northern bypass adjacent to the east channel of the river that could comprise as much as 1,500 linear feet (EA states both 1,000 and 1,500). This major highway-scale development along the restored Elwha River cannot help but accelerate streamflow, degrade salmon habitat, eliminate streamside vegetation, and increase the risk of downstream road washouts. As stated in the EA, "Hardening the bank of the Elwha River at the edge of its floodplain could cause inadvertent effects downstream. Redirection and acceleration of erosional forces from hardened bank structures may create a chain reaction of erosion and stabilization responses that lead to additional bank hardening." (EA p. 39) These extensive structures in prime spawning habitat could also place the restoration at risk. Engineered logjams and channel roughening seem insufficient mitigation for such potential devastation.

3) The preferred alternative requires 18 acres of clearing (4 ac. for road; 14 ac. for cutting and filling slopes) through mature and old-growth forest to accommodate the bypass road. The EA states that 80 trees over three feet in diameter at breast height (dbh) and 35 "very large" (4 to 6-foot dbh) trees would be removed, resulting in "...the loss of up to 50 old growth trees with marbled murrelet nesting habitat characteristics." (EA p. 56) Federally listed marbled murrelets are continuing a steep decline in Washington at the alarming rate of seven percent annually. Yet throughout the planning process thus far, no survey was conducted during nesting season. Rather, the EA references data from 1990. It is imperative that a marbled murrelet survey of the area following USFWS protocols be conducted during nesting season. Mitigation measures should also be put in place for the elimination of 18 acres of mature and old-growth trees before a final decision is made. Comparing these productive, low-elevation, valley bottom and toe-slope trees with the vast acreage of "Douglas-fir-hemlock forest type" in the entire Elwha Valley belittles their significance.

4) Phase II of the geotechnical analysis "to confirm the initial findings" of previous drilling underscores the hurried nature of planning for the project. With less than two months of data from initial drilling, the Federal Highway Administration (FHWA) judged the bypass alternative feasible, and NEPA planning commenced. The stated need for further geotechnical testing suggests that planning -- and pending approval -- is proceeding ahead of research and analysis, certainly ahead of public review. Again, a Finding of No Significant Impact mere months after release of an abbreviated EA that fails to evaluate the critical issue of slope stability could negatively affect ecosystem recovery. A full analysis in an EIS is required.

We realize this is a difficult decision. Motorized access to the Elwha valley is caught between a rock cliff and an active river. There are no easy answers, only grave and long-lasting consequences. We feel that park planners did a good job presenting those impacts that could be included in the limited format of this EA and pointing to larger impacts not addressed. Fortunately, the EA also lays out a clear course of action: "If the EA reveals significant impacts on park resources from the project, an Environmental Impact Statement and Record of Decision would be prepared." (EA p. 6) It is clear to us that this course should be followed.

The specter of ongoing climate change and increased flooding demands a long-term look at future access for this valley. After reviewing the environmental costs associated with the preferred alternative, OPA submits that fuller consideration should be given to a broader range of alternatives, including a scaled-down version of the bypass, the elevated roadway of alternative 3, and an all-purpose trail as recommended by the Elwha Klallam Tribe. We look forward to considering these and other alternatives in an environmental impact statement as required under the National Environmental Policy Act.

We thank you for the opportunity to comment.

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