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Superintendent, Olympic National Park
600 Park Avenue
Port Angeles, WA 98362

Re: The Final Disposition of the Enchanted Valley Chalet / Environmental Assessment

OPA is happy to comment on the Enchanted Valley chalet EA. The assessment reflects a tremendous amount of research and coordination, generous public outreach and sound scientific judgment. We support the preferred alternative, Alternative B, to dismantle and remove the chalet by flying and packing out non-native materials. We agree that it is the only sound, scientifically informed, and legally defensible approach to the ongoing problem of an aging building on a disappearing floodplain in designated wilderness.

As you know, OPA has advocated for removal of the chalet in previous planning sessions. We have been disappointed by the amount of public funds already invested in this doomed structure (see below) but pleased that the current EA offers a sensible, cost-effective, and environmentally sound course of action. We hope for timely implementation.

We do have some concerns about aspects of the preferred alternative and we hope our comments will help strengthen the final decision document.

We appreciate that our request for cost estimates for each alternative has been incorporated into the EA. This should provide a useful metric for those who insist on once more moving the chalet. We agree that cost estimates for Alternatives A and B, the no-action and move the chalet alternatives, must include the ultimate cost of removal as the river inevitably erodes the unconsolidated floodplain. Any approach but removal will prove short-lived. When considering the cost already incurred in preserving the old structure in its wilderness setting (\$171,000 for the 2014 move) and the exorbitant cost of moving the structure an additional 250 feet (estimated at \$1.25 million), we're floored. It is painful to consider the essential visitor services and pressing resource needs those dollars could have delivered during this time of austere Park budgets. We consider the estimated cost of the preferred alternative to be high at \$660,000; we hope it can be moderated by

fewer helicopter flights. But compared to the cost and futility of winching a three-story building on steel I-beams around a rapidly eroding floodplain, it's a bargain.

Preferred Alternative

While we agree that the removing the chalet is the only sensible choice, we balk at the number of helicopter turns required (99 in a worse case scenario). We understand that non-degradable materials (stove, chimney bricks, flashing, fasteners) must be removed. And of course there are the I-beams and other materials flown in for 2014 move. But surely there will be a way to fly much of that out in larger Type-2 helicopters outside of spotted owl and marbled murrelet nesting seasons, thereby necessitating fewer trips. We also urge you to pack out as much of these materials as possible with pack stock, and burn and allow the rest to recycle back into the forest ecosystem. All the logs were originally sourced from the area; it seems most could be recycled in place. We also request that dismantling the structure be carried out using a minimum of motorized/powering equipment.

OPA is concerned, as you must be, about the structure being undercut and collapsing into the Quinault River this winter. Should this be the case, the EA should provide for emergency removal by burning (after removing unburnable materials). Burning in place during the winter season would ameliorate the danger of wildfire. Impacts on vegetation and soils would be moot (they would be washed away). The "attractive nuisance" of a partially burned chalet would be less noticeable and ecologically damaging than a collapsed chalet in the riverbed. Wilderness character and fish habitat would be improved immensely.

We commend you on your thorough and nuanced discussion of wilderness character in the document. We agree that Alternative B will result in overall beneficial effect on all qualities of wilderness character as well as fish and wildlife. Special status species and soundscapes will be temporarily affected by removal, but the overall benefit to the wilderness and ecosystem will be long-term.

Even without the extensive considerations of wilderness character and natural resource protection, science alone provides overwhelming rationale to rule out moving the chalet or leaving it in place. Preliminary soils mapping of the valley indicated debris aprons, debris cones, unstable river deposits, and a hyperactive floodplain. With a rapidly melting glacier upstream, continued lateral erosion of the East Fork Quinault River is a certainty. The 2018 Sight Flood Hazards Survey Report confirmed this. Its principal conclusion, that "the remaining terrace area in the vicinity of the Chalet is at very high risk of erosion and flooding within the next 20 years," is definitive.

As we mentioned in our scoping letter, the chalet was added to the National Register of Historic Places in 2007 due to its *local* significance. In contrast,

Olympic National Park and the Daniel J. Evans Wilderness are of national -- and it could be argued *international* -- significance. More than enough staff time, expense, and controversy have been expended on the old hotel. Let's finish this and focus on some of the more significant and pressing issues facing Olympic National Park.

The Quinault remains a wild and dynamic river. Its natural processes have shaped the Enchanted Valley and given us the incredible natural diversity and beauty that draws us there. It is up to us humans to adapt our use and enjoyment of the valley to its natural conditions. Thank you for this opportunity to comment. We look forward to a wild and restored Enchanted Valley.

Sincerely,

Tim McNulty
Vice president, Olympic Park Associates