

*The mission of the  
Olympic Forest Coalition  
is to protect and restore  
forest and aquatic ecosystems  
on the public lands  
of the Olympic Peninsula.*



**Olympic  
Forest  
Coalition**

**Autumn 2008**

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*We thank all our members and donors  
for their financial support. If you have  
not yet contributed, we hope the  
enclosed envelope will help inspire you.*

*As you will see, by this newsletter, we  
busily continue to fulfill our mission,  
and need your help to keep doing so.*

*More than ever, the Olympic forests  
need devoted friends and allies. Please  
consider sharing your talents, interests  
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The deep woods and laughing creeks,  
still teeming with life, will thank you.*

## Public Rejects Dosewallips Road Plans

*by Jim Scarborough*

The comment period for the most controversial project on the Olympic National Forest in 13 years has closed and the verdict is crystal clear. By a whopping margin, the public has rejected plans by the U.S. Forest Service, National Park Service, and Federal Highway Administration (FHWA) to reconstruct the washed-out Dosewallips Road through rare, beautiful and environmentally sensitive terrain.

Many of our readers have closely followed this topic since a major rain-on-snow event caused the Dosewallips River to devour several hundred yards of Forest Service Road 2610 in January 2002. The washout is located in the Olympic National Forest west of Brinnon, about five miles shy of its previous terminus in the adjacent national park.

In the more than six-and-a-half years which have followed, Olympic National Forest Supervisor Dale Hom, at the insistence of a provincial and misguided National Park Service, has bent over backward in attempts to get this road reconstructed. Its reroute would penetrate either the

salmon-holdout river itself or the 500-year-old ancient forest on a steep, unstable slope above, despite the presence of five threatened species and a host of established rules clearly forbidding such action.

The latest chapter of this sorry saga has involved publication by the Forest Service and Park Service (along with a vocally skeptical and reluctant FHWA controlling the purse strings) of a hopelessly flawed, draft environmental impact statement (DEIS). An unprecedented public response of nearly 500 submitted comments has overwhelmingly rejected the DEIS's pro-road bias.

This artificially narrow DEIS fails to study the public's years-long requests for an alternative that would convert the final five miles of the Dosewallips Road into a scenic, three-season, non-motorized trail, as well as analyze longer-term management options for environmentally friendly access to the upper valley. Perhaps worse, the DEIS paves the way for road reconstruction through the Forest Service's self-issuance of a get-out-of-jail-free card, in the form of waiving its own environmental rules.

It was predictable, then, that a public backlash would result. In

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*Dosewallips.....Continued from Page 1*

a review of all submitted comments, OFCO Executive Director Bonnie Phillips and a Forest Service representative tallied 361 letters or other forms of communication *against* reconstruction of the Dosewallips Road, with 138 comments in favor of reconstruction, amounting to a lopsided split of 72 percent to 28 percent disagreeing with the DEIS. Additionally, four regional Indian tribes and two large recreation groups (The Mountaineers and Washington Trails Association) registered their displeasure with the Forest Service's and Park Service's direction.

Moreover, each and every state and federal agency that reviewed the DEIS found serious fault with it, including state Fish & Wildlife, the Environmental Protection Agency, National Marine Fisheries Service and, most importantly, the state Department of Ecology. It is salient here to mention that Ecology has the power to stop this road disaster in its tracks, by denying a permit for exceedance of Clean Water Act standards. We urge Ecology to stand firm and resist the expected bullying from the Park Service. Jefferson County commissioners also are highly ambivalent about the DEIS and generally opposed to cutting those old growth trees in the way of harm.

Previously, Supervisor Hom stated that the Forest Service should attempt to reconstruct the

Dosewallips Road because that's what a majority of the public favored. Obviously, this is no longer the case. Mr. Hom's decision is expected in late winter, and we hope he recognizes that the Forest Service cannot achieve its broader mission without the support of the taxpaying public. It is past time for both the Forest Service and Park Service to acknowledge that this road is a no-go.

What is needed at this point is a supplemental DEIS that expands the purpose and need of the project to entail a comprehensive look at reasonable public access options on the Dosewallips that don't harm the remarkable natural resources found there, including the beautiful and slope-stabilizing ancient forest now known as the Polly Dyer Grove. The logical course is to convert the final five miles of road into a non-motorized trail, with parking and possibly new camping facilities located down valley of the washout. As has now become obvious, the majority of the public would be supportive of this outcome.

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## OESF Work Goes On—and On

*by Marcy Golde*

OFCO focuses much of its work at the state level on the Olympic Experimental State Forest (OESF) on the west side of the Olympic Peninsula. The 2005 Settlement with the Washington State Department of Natural Resources (DNR), after our successful lawsuit challenging DNR's Sustainable Harvest Calculation, required them to start at once on an OESF Landscape Plan, including all elements of the DNR's Habitat Conservation Plan (HCP).

The OESF Landscape Plan includes several alternatives, one of which is a "Conservation Alternative." That alternative will call for use of biodiversity harvests with thinning, and small areas called "skips" (no cutting) and "gaps" (clearcutting). Derek Churchill, a contractor for Northwest Ecosystem Alliance (NWEA), has been working on the definition of just how this harvest would be done for the Conservation Caucus (OFCO, Washington Environmental Council, NWEA, and WA Audubon). A draft document emerged this summer.

DNR asked the Conservation Caucus to review this document and to see if we agree with their definition of "Biodiversity Pathways." OFCO's Jill Silver and other OFCO members have done so, adding to the definition

of biodiversity and expanding the sections on research, monitoring and adaptive management.

The review, once approved by the Conservation Caucus, will be returned to DNR with the request that it be included in its entirety in the Conservation Alternative Draft EIS on this Landscape Plan, scheduled for release next year.

Following is the essence of OFCO's input:

**Opportunities from Using This Biodiversity Pathway**

If DNR follows this definition of biodiversity and diligently monitors outcomes:

- DNR will be preparing a lasting legacy by 1) truly managing the OESF for the benefit of our children and grandchildren, and for multiple species thriving at all levels of diversity; 2) producing a predictable flow of value-added timber as well as healthy, biodiverse ecosystems, which support all levels of diversity; and 3) showing the world that conservation and commodity production are achievable together, although neither can be pursued to maximum levels without being mutually exclusive.
- DNR will demonstrate responsible management by using adaptive management to provide certainty that responses to silvicultural treatments are resulting in all the desired outcomes.
- This pathway will provide additional ecosystem services,



which, if valued in an economic context, could also provide DNR with additional benefits and credit.

**Defining Biodiversity Pathway**

There is no single standard definition for biodiversity—which is a contraction of "biological diversity"—but the term, first published by E.O. Wilson in 1988, refers to the variety of life on the planet.

The Washington Biodiversity Council ([www.biodiversity.wa.gov](http://www.biodiversity.wa.gov)) defines biodiversity as "the full range of life in all its forms." It is sometimes referred to as the "web of life." This definition includes "... all species found

within the state, from tiny soil microbes to towering Douglas-firs [as well as] the interactions that sustain each species, such as predator-prey relationships, and the physical processes on which life depends, including chemical and nutrient cycling, water filtration, and climate regulation."

Biodiversity can be considered at four principal levels or scales. Ranging from smallest to largest, these are 1) genetic diversity within and between species, that is, the unique genetic composition of individual members of a species;

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State Forest....Continued from Page 3

2) species diversity, or the number and type of different species found in an area; 3)ecosystem diversity, or the different types of ecological systems of land, water, and organisms; and 4) landscape diversity, also referred to ecoregional diversity, where ecoregions encompass multiple ecosystems\* to reflect broad ecological patterns.

To read Washington Biodiversity Council's 152-page December 2007 Conservation Strategy, visit

[www.biodiversity.wa.gov/documents/WABiodiversityConservationStrategy.pdf](http://www.biodiversity.wa.gov/documents/WABiodiversityConservationStrategy.pdf)

**Harvest Prescriptions** are defined for thinning of various age classes, for riparian protection, and for response to blowdown.

**Research and Monitoring:** Must link all harvest to research and monitoring, establish provisional benchmarks for a variety of measures of biodiversity health, and then conduct the ongoing research and monitoring to refine the benchmarks and to assure that the harvest meets the benchmarks and thus the definition of biodiversity.

\*Ecosystems are defined as "integrated ecological systems of land, water, and living organisms in contiguous areas," such as watersheds.



## Update: Upper Dabob Natural Area Proposal

by Peter Bahls

Major headway has been made in the effort to provide permanent protection to Tarboo-Dabob Bay, one of the highest quality and most sensitive estuarine bays remaining in Puget Sound. This proposal expands the boundary of the existing Dabob Natural Area Preserve to include the slopes draining to the bay, a total of about 3,500 acres that extends from the head of Tarboo Bay south to Broadspit and Camp Discovery in Dabob Bay.

The purpose of the expansion is to provide long-term protection for:

- water quality
- a diversity of at-risk species
- high quality habitats, including coastal salt marsh spits, productive shellfish beds, shoreline forests and tidelands.

Within the boundary, the Washington State Department of Natural Resources (DNR) would be able to write grants and work with willing landowners to buy property or to negotiate conservation easements as part of the Natural Area. In addition, over 1,000 acres owned by DNR would be transferred from timber management to a protected status

as part of the Natural Area. This transfer of state land would happen in phases as Trust Land Transfer funding from the legislature became available to reimburse the trust. In the last biennium the state legislature approved \$5 million for Trust Land Transfer for Tarboo-Dabob Bay.

*These forests along the marine shorelines are an increasingly rare and important part of the Puget Sound ecosystem.*

The area contains extremely steep and unstable slopes that are ill-suited to timber cutting, as well as large tracts of naturally regenerated (not plantation) older growth forest (80–100 years old) with old growth residual trees. These forests along the marine shorelines are an increasingly rare and important part of the Puget Sound ecosystem. Logging and development projects on these slopes in the past have caused severe problems for commercial shellfish growers and landowners due to flooding, landslides and siltation.

DNR held a public meeting in Quilcene on May 27 to present the Upper Dabob Natural Area proposal, with an overwhelmingly positive response. More than 150 people attended. When DNR staff later briefed the Natural Heritage Advisory Council (NHAC) at their June meeting, they said they had received 75 written

comments, all in support of the proposal. The NHAC voted to approve the proposed Natural Area boundary and include the additional "areas for consideration" in the northeast and northwest corners.

The success of this proposal is largely due not only to its outstanding merit, but to the large, broad-based coalition of people that have supported the effort, led by Northwest Watershed Institute, Jefferson Land Trust and The Nature Conservancy. The coalition includes OFCO, local and state-wide conservation groups, shellfish growers, local landowners and citizens of Jefferson County, Jefferson County Commissioners, Hood Canal Coordinating Council (HCCC) and Tribes.

Since June, there have been a number of positive developments.

Most elected officials and state agencies are on board. The county commissioners, and heads of Washington State Department of Ecology, Washington Department of Fish and Wildlife, and Hood Canal Coordinating Council (representing Kitsap, Jefferson and Mason Counties, and Skokomish and Port Gamble S'Klallam Tribes) have written letters to DNR in strong support of the proposal. In addition, the county commissioners and HCCC requested that DNR drop its proposed East Tarboo Creek timber sale bordering the

northeast corner of the proposed boundary and incorporate this land (south of Coyle Road) in the expanded preserve.

Meanwhile, legal action has stopped DNR from pushing a timber sale into the proposed Natural Area. DNR's proposed East Fork Tarboo Timber Sale was appealed by a coalition of shellfish companies, local landowners and the Northwest Watershed Institute, and Superior Court Judge Craddock Verser upheld the appeal. By so doing, he determined that DNR's Declaration of Non-Significance (DNS) for the timber sale did not fully comply with the State Environmental Policy Act (SEPA). The Natural Area boundary recommended by the NHAC included two-thirds of the timber sale area and all of the proposed road construction. The appellants were concerned not only with the impacts of clearcutting important naturally regenerated older forest types within a proposed natural area, but also flooding and siltation on downstream shellfish beds. In sum, DNR's DNS has been declared void. They may appeal the ruling or it may decide to go through a full SEPA review. Alternatively, they could decide to drop the proposed timber sale from further consideration and add the entire area to the Natural Area preserve as many have been requesting.

The final steps are for DNR to hold an official public hearing on the proposal before a final decision from DNR's

Commissioner of Public Lands. DNR has delayed this public hearing, which they originally stated would be sometime in July.

The timing is of interest. Lands Commissioner Doug Sutherland is now in a close re-election race against Peter Goldmark, a Democrat with a strong environmental agenda, who has already stated his support for the Dabob Bay proposal. **There will be a public hearing on Oct. 23 at 6 PM at the Quilcene High School;** doors open at 5:30. We ask all of you who attended the May public meeting in Quilcene (and those who didn't!) to please attend the hearing. We continue to believe that the protection of Dabob Bay is of the utmost importance and that public support continues to play a critical role.

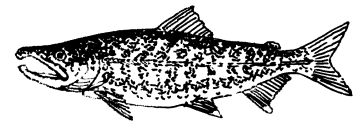


illustration by Larry Eifert

## NOAA Sets Marine Sanctuary Scoping Hearings

While it doesn't precisely conform to OFCO's mission statement, protecting the Olympic Coast National Marine Sanctuary (OCNMS) is of great interest to us because it focuses on the Olympic Peninsula, as does OFCO in its work on public forest and aquatic protection.

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Sanctuary.....Continued from Page 5

We've recently learned that the National Oceanic and Atmospheric Administration (NOAA) has scheduled scoping hearings on the management plan; you can find the schedule at [www.olympiccoast.noaa.gov/protection/mpr/mpr\\_meetsched.html](http://www.olympiccoast.noaa.gov/protection/mpr/mpr_meetsched.html)

Please submit scoping comments and encourage your friends and colleagues to do so. The scoping comment period runs through November 14, and there's a public meeting at the Seattle Aquarium on October 5, at 7 p.m. Spread the word.

When you submit a comment, please point out the importance of biodiversity protection. The sanctuary published a list of priority topics, but biodiversity protection is not on it. Resource protection is the sanctuary's primary goal, and should be a priority in a Marine Protected Reserve. Although spill prevention—an important topic for sure—is on the list, resource and biodiversity protection is a far broader topic.

For example, OCNMS has some of the world's rare and vulnerable deep-sea corals, which are damaged by fishing gear despite the sanctuary's mandate to prohibit seabed alteration. We need to encourage the sanctuary to protect the ecosystem comprehensively against multiple impacts.



- Larry Eifert

## Thinking Like a Mountain on the Olympic Peninsula – Wolves in Our Future

by John Woolley

Thinking about the long-run consequences of our actions regarding wolves takes us directly to the heart of ecosystem management and the role of the carnivore.

"My own conviction on this score dates from the day I saw a wolf die," wrote Aldo Leopold in *A Sand County Almanac*.

The successful reestablishment of wolves back into the Yellowstone area has led to interest in whether wolf reintroduction could work in the Olympic ecosystem as well.

Many of us are giving it thought. A specific concern is, in the words of Connie Gallant, "I'm thinking about the protection of the wolves. I do not want to see

sanctioned slaughter of wolves around here the moment the wolves 'do in' a domesticated sheep."

The next thing that comes to mind is shooting of wolves from helicopters or small planes, a long-standing (and much-decried) practice that Alaska's now-famous governor champions.

To move the topic beyond our emotions about wolf killing, it might be helpful to approach the topic by way of a peripheral—or as the western mind calls it—ecological analysis. The wolf was here before the white man, and here are some things we know:

Wolves will return to their habitats naturally, when random killing is discouraged.

In Yellowstone, elk overbrowse in open areas, because they have no need to seek safety in the trees, resulting in stunted aspen, affecting biodiversity. In the Olympics, elk have been destroying streamside willows, adversely affecting salmon habitat.

In recent years, wolves have swum from the British Columbia mainland to reclaim their role in the temperate rain forest on Vancouver Island. They feed on salmon runs. (*The Last Wild Wolves*, Ian McAllister)

Ecosystem health is dependent on its largest predator, a point well demonstrated in ecologist Dave Foreman's 2004 book, *Rewilding North America*.

The disastrous ecological result of killing all wolves in Arizona/New Mexico is the core theme of Aldo Leopold's *Thinking Like a Mountain*.

Wolves dominated coyote populations and may be the sole means to control them.

Specifically, wolves may help the recovery of the Olympic marmot.

The issue is so much bigger than our individual feelings that it's like arguing with Mother Nature. The species itself does not suffer if killing is managed. I'm not fond of this part, but the state of Washington has to make "excess" wolves a game management issue, in order to control it.

Recently at the Gray Wolf trailhead, an excited motorbiker stopped to exclaim he had just seen a cougar, "seven feet long." He had driven quickly around the corner and caught it "off guard." Already in camouflage, he jumped off his motorbike and started chasing it down a steep creek. Not seeing a rifle (or a camera), I asked what he intended to do when he caught up with the cougar ... touch it perhaps? Let us count coup. This excitement is part of us; we are hunters in many ways.

The major point is that the world is a much less whole place without carnivores. The simple fact that we can limit species in an ecosystem is the very reason we must strive to repair and restore when and where we can.

Logical questions are: If wolves are reintroduced on the Olympic Peninsula is there sufficient habitat? Or, have we devastated areas so much that wolves would not have adequate living space? How many wolves are sustainable?

Wolves augment the survival potential of a diverse ecosystem. They will not eat themselves out of house and home. Note how quickly the Yellowstone wolves have reached Washington. Wolves move on until a balance returns. The role of human stewardship will be interesting to observe.

The U.S. Fish and Wildlife Service (USFWS) has done studies of wolf feasibility on the Olympic Peninsula. Three viable habitat areas currently exist in the west Olympics, in the watersheds of the Soleduck, Bogachiel, Hoh, Queets, and Quinault Rivers. The three habitat areas would support a total of about 50 wolves. The keys to continued sustainability are keeping the lowland West End forests intact and avoiding enabling housing development.

Olympic National Park is proposing park additions around Lake Ozette that would protect sockeye salmon streams, as well as promote sustainable habitat for elk and wolves. The hunting issue will be a major factor and could lead to a designation similar to the Arctic National Wildlife Refuge under the USFWS. The vital objective is to provide ample lowland habitat

and manage it in cooperation with private and government agreement.

Federal protection has recently been restored to the 1,500 wolves scattered across the Northern Rockies. The Wyoming Game and Fish Department plans were judged to be "not fully developed." The role of wolf hunting had taken precedent over developing sustainable populations.

Washington state is currently developing a wolf management program considering the number of breeding pairs in the state before hunting can begin. Wolf advocates are concerned that the present state proposal of 15 breeding pairs in the entire state is too low. Genetic isolation is the concern, as well as premature hunting and lethal control methods.

The North Cascades Conservation Council (NCCC) is coordinating efforts for responsible wolf management; contact jimdavis@northcascades.org.

National Wolf Awareness Week this year is October 19–25.

OFCO offers our sincere condolences to the family and friends of slain U.S. Forest Service law enforcement officer Kristine Fairbanks. We appreciate her many years of duty and investigative work on such crimes as old-growth cedar theft on the Olympic Peninsula. Donations to the Kristine Fairbanks Memorial Fund are being accepted at any First Federal Savings & Loan branch on the Peninsula.

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