



*PROMOTING THE PROTECTION, CONSERVATION AND RESTORATION OF NATURAL FOREST ECOSYSTEMS AND THEIR PROCESSES ON THE OLYMPIC PENINSULA, INCLUDING FISH AND WILDLIFE HABITAT, AND SURROUNDING ECOSYSTEMS*

March 13, 2019

Ms. Sarah Creachbaum, Superintendent  
Olympic National Park  
600 East Park Avenue  
Port Angeles, WA 98362

RE: Olympic Hot Springs Road Long-Term Access/Environmental Assessment

Dear Superintendent Creachbaum:

I am writing on behalf of the Olympic Forest Coalition (OFCO), a member organization working to protect the environment, species and habitat of public lands - local, state and federal – and the associated marine waters of the Olympic Peninsula. Thank you for the work of the Park staff and the Federal Highways to provide important information to the public, and the opportunity to visit the site. The work of the dedicated professionals is greatly appreciated. OFCO concurs in the comments and supplementary comments provided by the Olympic Park Associates and the National Parks Conservation Association on the Olympic Hot Springs Road Long-Term Access project. OFCO joins these Park leaders in asking that the Olympic National Park reconsider the decision to conduct the more limited Environmental Assessment on the Olympic Hot Springs Road Long-Term Access (the Project), and instead conduct an Environmental Impact Statement. OFCO submits the following comments for your consideration.

#### Marbled Murrelet Habitat / Threatened and Endangered Species

The Marbled Murrelet are in critical decline, especially in Washington State where the population is decreasing at an annual rate of 3.9% from 2012-2018 (see et al, RDEIS, Long Term Conservation Strategy for Marbled Murrelets, at <https://www.dnr.wa.gov/mmltcs>). Murrelet population surveys show a dramatic “red zone” decrease in populations along the Straights of Juan de Fuca, precisely in the area under consideration by the Project. Pressure on state managed trust lands to provide timber and revenue to trust beneficiaries has meant that the Murrelet habitat on federal lands is viewed as sufficient to meet the needs of the species. Reducing any habitat on federal lands should be considered cumulatively with the adjoining land ownerships in an EIS analysis.

Please consider conducting a full EIS to study all other endangered species in the Project area, including salmonids, pollinators, and other threatened and endangered species. The analysis should endeavor to present information on impacts and avoid analysis and alternatives that favor one species over the other (salmonids vs. Murrelets). Our scientific knowledge is insufficient to make choices based on what is less impactful for one specie, or good for one specie, over another. The goal should be to fulfill legal obligations under the ESA for all threatened and endangered species.

Recommendation: Analyze all endangered species in a full EIS process. Reduce cuts and fills and incorporate structures to preserve as much of the surrounding forest as possible, with special attention to preserving the 42 old-growth, potential Murrelet platform trees (2.5- to 6-foot diameter).

#### Elwha River Restoration Program

The Elwha River Restoration Program is one of the few restoration programs that serves both as a visionary, successful effort to restore a watershed - headwaters to estuary – and as a model for what may be accomplished by dam removal. OFCO supports the goal of full restoration of the Elwha watershed, including access for recreation and research purposes. The one-mile bypass road alternative, carried out

with the least impacts, is one that will meet the projected purpose and need for the action: restoring motorized access to the upper valley. A full EIS will better ensure that the new bypass road is designed and constructed to minimize impacts to both the river, its fisheries, threatened and endangered species, historic sites and cultural resources, and to the mature and old-growth forest in the Project area.

Recommendation: Analyze all alternatives in a full EIS process, with an expanded purpose and need of complete restoration of the Elwha, conservation of species, and recreational and research access. We concur with the Olympic Park Associates recommendations that this includes: a) reducing the paved surface width to 20 to 22; b) conform the road as close to natural slope contours as feasible, reduce cuts, fills, and retaining structures, and include full native revegetation plan for disturbed areas – all with the goal of species and habitat conservation as the primary consideration;

Other Potential Alternatives

The preliminary information presented did not include one alternative that may provide an important book end for the analysis: purchasing the in-holder properties and providing more limited recreational and research access to the Elwha areas. Consider sharing preliminary analysis of the potential purchase of in holder properties and a much more limited access to the areas for research and recreational purposes. While this option does present complexities in policy and implementation, we hope the option could be preliminarily considered.

Recommendation: Please share preliminary analysis of the potential purchase of in holder properties and a much more limited access to the areas for research and recreational purposes.

Thank you for your service and commitment to our precious public lands, and demonstrated commitment to exploring the best options for the community, recreation, species and our Park.

Sincerely,

A handwritten signature in cursive script that reads "Patricia Jones". The signature is written in black ink and is positioned to the left of the typed name and title.

Patricia Jones  
Executive Director