



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Washington State Habitat Office
510 Desmond Drive SE/Suite 108
LACEY, WASHINGTON 98503

August 18, 2005

Virginia Grilley
Acting Forest Supervisor
Olympic National Forest
1835 Black Lake Blvd, SW, Suite A
Olympia, WA 98512-5623

Re: NEPA Scoping Comments on the Dosewallips Road Washout

Attention: Tim Davis

Dear Ms. Grilley:

The following comments and recommendations are being provided pursuant to the National Environmental Policy Act (NEPA), the Endangered Species Act (ESA), the Magnuson-Stevens Fishery Conservation and Management Act (MSA), and the Fish and Wildlife Coordination Act of 1958. They are provided as technical assistance and do not fulfill the requirements of section 2(b) of the Fish and Wildlife Coordination Act. We are writing this letter to provide comments from the National Marine Fisheries Service (NMFS) for your proposed repair of the Dosewallips Road Washout.

Please consider these NEPA scoping comments for the DEIS being developed by the Olympic National Forest for the Dosewallips Road. We have serious concerns about the proposal to replace the washed-out road into the Dosewallips River channel. NMFS recommends the DEIS fully analyze the alternative of road decommissioning to begin restoring watershed processes that support salmon recovery.

Based on the discussion of the Forest Service interdisciplinary team (IDT) on June 1, 2005, and summarized in the NOI (FR 70, 47171, August 12, 2005) you are proposing a NEPA statement of Purpose and Need that aims to restore motorized access for the five miles of road beyond the washout. Recall that the previous round of NEPA for this same road washout highlighted the environmental benefits of closing and decommissioning the road beyond the washout. NMFS believes that maintaining and reconstructing the road within the Riparian Reserve is contrary to the Aquatic Conservation Strategy of the Northwest Forest Plan. Decommissioning the road beyond the washout would begin to restore watershed processes that support salmon recovery. Some road segments beyond the washout are also at high risk for future washouts and landslides. Simply put, restoring motorized access past the current washout will not solve the long-term issue that this entire road is in the wrong location to support the ecological objectives of the Aquatic Conservation Strategy and recover threatened salmon.



The Dosewallips River contains an independent population of Puget Sound Chinook salmon that is essential to recovery of that Evolutionarily Significant Unit (ESU). The Puget Sound Chinook ESU is listed as threatened under the ESA. A serious long-term adverse effect to that population may be so great as to cause Jeopardy to that ESU. When there is a proposed action by the Forest Service, typically after a DEIS is published, then NMFS would be asked to consult if the proposed action may affect an ESA-listed species.

Although NMFS has not yet been asked to begin consultations under ESA or MSA, our preliminary analysis of any alternative that would place road material in the Dosewallips River is that could seriously limit the abundance and productivity of Chinook salmon in that river, over the short and long-term. While we have not analyzed the effects of the proposed action the Forest is examining under NEPA, we believe the action could have dire consequences to Dosewallips Chinook and their critical habitat.

The Dosewallips River also contains essential fish habitat (EFH) for Chinook, coho, and Puget Sound pink salmon. Replacing the road into the Dosewallips River would be a serious adverse effect to EFH for those species. Replacing the road into the river would not conserve EFH, and it is not clear how any mitigation could compensate for those potential long-term adverse effects on salmon EFH.

part on the Geomorphic Processes report by your conditions along the Dosewallips River in the vicinity Road 2410, April 30, 2003). That report washout conditions and well reasoned analysis of cut road into the river. Our interpretation of that effects are likely to occur as a result of disconnecting spawning gravels, if the road is replaced into the river. complexes would not address the long-term loss of conditions.

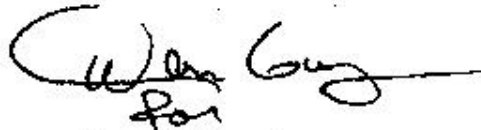
and with a low-water crossing were discussed at the design would be to somehow allow the natural is not clear how the natural routing of sediment long-term. Any bank hardening with riprap would cesses that support salmon habitat survival and

Our preliminary analysis is based in large staff (Geomorphic Processes and Habitat Vicinity of the Washout on U.S. Forest S appears to be a credible statement of possible the likely effects of replacing the washed report is that direct and indirect adverse the river from a significant source of spawning. The potential mitigation of in-channel loss spawning gravels and impaired channel conditions.

Details of the alternative to replace the road June 1 IDT meeting. While the intent of erosion of the high terrace into the river, could be maintained for either the short or further constrain the natural ecological processes recovery.

Therefore, we suggest the DEIS not fully analyze an alternative that would place any road material into the river. Please contact Matt Longenbaugh, who is the Level 2 contact from NMFS for the Olympic National Forest, if you have questions about this recommendation. Matthew.Longenbaugh@noaa.gov, 360-753-7761.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven W. Landino". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Steven W. Landino
Washington State Director
For Habitat Conservation

cc: Byron Rot, Jamestown S'Klallam Tribe
Ted Labbe, Port Gamble S'Klallam Tribe
Jeff Davis, WDFW
Greg Ballard, Jefferson County
William Laitner, Olympic National Park
Steve Morris, NMFS representative to the REO
Mark Hodgkins, FWS