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May 28, 2014

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

Re: Emergency Action to Temporarily Relocate the Enchanted Valley Chalet for the Protection of the East Fork Quinault River Environmental Assessment

Olympic Park Associates (OPA) supports the Purpose and Need of the proposed action, "to protect the East Fork Quinault River and its associated natural resources from imminent environmental harm," and "to prevent the Enchanted Valley Chalet from collapsing into the East Fork Quinault River and adversely impacting the streambed, hydrology, water quality, fisheries, other associated natural resources, and local wilderness character." OPA commends the park on recognizing natural resource protection as its highest priority. And we applaud the agency's decision to avoid active manipulation of the river channel or bank to alter natural stream dynamics of the East Fork Quinault River. As we wrote in an earlier letter on the chalet (1/14/14), "we urge you to resist calls for bank armoring using riprap, gabion baskets, or other artificial constraints on the river's hydrology. These actions would be detrimental to aquatic habitats, natural geologic process and ecological processes the park is charged with preserving."

However, we cannot agree that the proposed action, moving the chalet intact up to 100 feet from the stream bank, is the most efficient, effective or economic means of meeting the stated purpose and need. Both can be more easily met, with far fewer impacts and at a fraction of the cost, by dismantling, disassembling or razing the building in place.

We note that "[a]fter the chalet is removed, the NPS will embark on a separate planning process to assess options for final disposition of the chalet" [p.6]. While understanding the desire to prevent a collapse of the building into the river with next fall and winter's rains, this emergency EA in affect undercuts the purpose of the second by investing significant resources into a predetermined outcome: moving the chalet to another location in Enchanted Valley. Clearly, it would be more appropriate to complete a single EA or EIS that would allow a full examination and discussion of all the impacts as well as costs of the proposed

action and consider other sensible alternatives that were determined to be outside the scope of the current expedited EA.

Certainly, the location of the action in designated wilderness in a remote and scenic valley along a popular trail raises questions regarding the heavy use of helicopters (up to four hours a day for multiple days) as well as use of a ten-horsepower gas-powered engine to drive pumps for an unspecified amount of time. Both call for a fuller consideration of alternatives than this EA affords.

Regarding federally listed endangered species, we note that the action would take place during the breeding seasons for threatened spotted owls and marbled murrelets. The mitigation of "having helicopter flights stay at least 120 m above or away from habitat at all times" strikes us as inadequate given the severe noise of helicopter flights in a narrow valley and probable disturbance to nesting birds -- particularly considering the amount of helicopter round-trip flights throughout the more than 20-mile valley from Bunch Field to the project site. The EA's conclusion that the action "would have short- and long-term, negligible to minor, adverse effects on [listed] fish and wildlife and also some beneficial effects" seems optimistic and understates the case.

Regarding wilderness character, we disagree that the action "would have short-term, minor to moderate, adverse effects on wilderness character; as well as long-term, beneficial effects." We consider the effects to be significant during the one-week or more project period and long-lasting given the presence of the structure in a new location in a wilderness valley.

As the EA accurately points out, "the chalet was added to the National Register of Historic Places due to its local significance" [p. 26]. Nothing in the National Historic Preservation Act requires that the structure be preserved. Olympic National Park and the Olympic Wilderness are of national significance and worldwide renown. As you know, the Wilderness Act defines wilderness as an area "of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable..." It strikes OPA that the "imprint of man's work" in the form of a repositioned three-story building a new location in the spectacular Enchanted Valley would be strikingly noticeable. And it would diminish wilderness character.

Given these concerns, the resources required to carry out the proposed action, and the dramatic reductions to visitor services and park maintenance caused by budget cuts in recent years, the action merits a fuller and more considerable discussion and assessment than the expedited EA affords.

Thank you for the opportunity to comment on this proposal.

Sincerely,

Tim McNulty

Vice president, Olympic Park Associates

cc: Senator Patty Murray  
Senator Maria Cantwell  
Representative Derek Kilmer  
Governor Jay Inslee