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

Re: Final Disposition of the Enchanted Valley Chalet EA

OPA appreciates the opportunity to comment on the scoping phase of the Enchanted Valley chalet EA. Since the concise EA released in 2014 failed to address a number of important issues related to the chalet, we welcome this opportunity for a more thorough and considered discussion. We hope that no further emergency action will take place prior to completion of this NEPA process.

Purpose and Need.

We support the Purpose and Need of the current plan: to determine the final disposition of the chalet, and to have a plan in place when the river once again comes calling.

The Purpose and Need of the 2014 concise EA was "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." Unfortunately, this was broadly viewed by the public -- and promoted by chalet advocates -- as a heroic effort to "save" the chalet. This legacy continues in the current planning process, as embodied in a fourth alternative added during scoping, "Relocate to Another Location in the Valley."

We suspect that this alternative will fail to meet the stated purpose of a *final* disposition of the building due to the unstable geology of the Enchanted Valley. Preliminary soils mapping of the valley indicates 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. So moving the building elsewhere in the valley would be a temporary measure at best, and would not meet the plan's stated purpose.

Considerations OPA believes should be included in the current EA.

Cost. A thorough economic analysis of the costs associated with each alternative should be presented. Analysis should include costs of planning, coordination, contracting if needed, oversight, and transport, including moving materials out of the valley.

Also, we request a complete economic accounting of the 2014 chalet move, including the above elements, be presented as well since this was not included in the earlier EA. A realistic accounting should include other Park programs, visitor services and amenities from which funds were borrowed to pay for the 2014 move. Members of the public should have this information available to fairly evaluate alternatives.

Science. We trust that this decision will be science-based. A discussion of the geology, hydrology, river morphology, changes in rain and snowfall patterns, historic avalanche and debris-slide areas, climate change-driven reduction of the Anderson and Hanging glaciers, up-to-date site mapping, and other pertinent factors should be prominent. We also think a discussion of the ecological role cottonwood trees may play in floodplain habitats would be useful in evaluating the fourth alternative; our understanding is that several trees would have to be removed for another chalet move.

Wilderness. In the absence of a wilderness stewardship plan for the Park, a thorough discussion of the Park's responsibilities under the 1964 Wilderness Act is needed. The 2014 EA simply stated that adverse impacts on the wilderness character of the valley from moving the chalet would be "short-term, minor to moderate," and would have "long-term, beneficial effects." We disagree. 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 jacked-up repositioned three-story building in a new location in spectacular Enchanted Valley is strikingly noticeable. Moving it again to a new location would further diminish the wilderness character of the valley. We also believe that the motorized means required to move the 30-ton structure is contrary to the Act.

Historic Significance. The 2014 EA and current scoping letter accurately state that the chalet was added to the National Register of Historic Places due to its local significance. In contrast, Olympic National Park and the Olympic Wilderness are of national -- and it could be argued *international* -- significance. The EA should include an honest discussion of the Park's obligations under the

National Historic Preservation Act. It is our understanding that a federally listed historic property such as the chalet must be thoroughly documented before it can be removed or allowed to collapse (or be washed away), and that preservation, reconstruction, or relocation is *not* required by law. At least one Washington state official claims otherwise, a claim echoed by chalet advocates. This should be clarified. It should be also stated whether documentation required by NHPA is complete. Gross misrepresentation regardless of the source should not influence the decision.

Recreation. Enchanted Valley is one of the most stunning wilderness landscapes in Olympic National Park, located on a popular cross-Park trail. Accelerated erosion of the floodplain has significantly reduced camping opportunities at this popular site. Most riverside camps have been washed away. A cluster of campsites remains around the older conifers and bear line. The proposal to move the chalet to this location could further reduce available campsites and would dominate and obstruct views from the campsites that remain. Despite claims, the chalet is not the reason everyone hikes to Enchanted Valley. Far from it. Other requests that the chalet be reopened for public use, horseback tourism, commercial bookings, or other "historic" uses should be addressed and dismissed. But direct impacts on wilderness use should be quantified and evaluated.

Thanks for your consideration of these points. We look forward to participating in the planning process and helping restore the magnificent wilderness of Enchanted Valley.

Sincerely,

Tim McNulty  
Vice president, OPA