

April 3, 2017

Paula Jablonski and Dana Butler
Olympic National Forest

Re: OPA Scoping Comment on *Dungeness Watershed Roads Management Project*

Thanks for the opportunity to comment early in this project. Olympic Park Associates (OPA) has advocated for many of these management actions through our participation in the Dungeness Watershed Action Plan and other planning efforts. We fully support the decommissioning, and storage of the 31.5 miles of unneeded, unstable, or erosion-prone roads identified in the plan. We also support the 1.4 miles of trail conversion, relocating trailheads, and retention of the 2870-270 road for access to the Maynard Burn trail. All are described in your March 17 scoping letter.

These actions will not only protect streams, tributaries and the Dungeness River from ongoing sedimentation and fish habitat destruction, they will protect remote backcountry areas and sensitive wildlife habitats from incursion by illegal and destructive motorized use by ORV/ATVs, trash dumping, random shooting, and unauthorized trail construction.

We strongly support the Watershed Action Plan's decision to decommission the upper 2870 road beyond the Tubal Cain/Dirty Face Ridge trailhead. Motorized access has encouraged increasingly heavy use of the Silver Lakes way trail, a poorly sited short cut to Silver Lakes in the Buckhorn Wilderness. This access (and the route's promotion on web sites) has led to overuse, trampling, and illegal fires in the subalpine lake basin. All have severely impacted the wilderness character of the area. OPA has long advocated this road closure, and the Forest Service agreed in its 1978 Canal Front Land Use Plan. We are encouraged to see the agency finally taking action. We fully endorse the current approach to decommission this road section and ask that you resist pressure to convert it to trail. The existing way trail traverses wetlands, creek banks, and steep erosive slopes adjacent to Silver Creek, which experiences resource damage from heavy use. A good trail to this area (No. 842) exists from the Mount Townsend trail (849).

For similar reasons we ask that you continue in your resolve not to reopen the decommissioned former 2860 (Dungeness Crossing) road as a trail for horse and mountain bike use. The Pacific Northwest Trail Assn. and other recreation groups have been advocating this. But the acute instability of the area, dramatized again this past winter by a massive slope failure, confirms the foresight of your earlier decision to fully decommission this problematic road.

We also encourage you to expand the project by decommissioning the 2875-150 spur that encroaches into the wild lower Gray Wolf watershed. As you know, the Gray Wolf is an immensely popular wilderness hiking destination served by adequate trails. Road incursion into the watershed east of the 150 spur (the end of the 2875 road) has been decommissioned and the landscape restored as a result of a popular forest stewardship project. Decommissioning the 150 spur (along with the proposed 155) would complete the restoration of this important and accessible wilderness valley.

An ongoing issue and continuing threat to water quality and aquatic habitats is illegal motorized use of off-system, uninventoried or "Legacy" roads. This use, particularly during wet winter months, contributes heavy siltation to tributaries of salmon streams with listed stocks. OPA first raised this concern in a January 4, 2003, letter on the Forest's Access and Travel Management Plan. We hope this project will consider some simple actions that will reduce the destructive impacts of these previously closed roads.

There are several in the watershed that have been reopened by ORV/ATV users. Two deserve to be immediately addressed. One is a spur a short distance up the 2875 road that accesses upper tributaries of McDonald Creek. It now provides ORV access to a network of closed roads on adjoining WA Department of Natural Resources lands where severe damage has occurred. A failed tank trap at the junction with 2875 could be repaired to permanently close illegal motorized access to this spur.

Another is the former 2875-040 road, which connects with the proposed decommission of the 2875-050 road and is part of the historic CCC Slab Camp road. This road has been reopened by ORV users at Pat's Creek and has spurred additional ORV trails being forged in the headwaters and wetlands of Pat's Creek and Bear Prairie. A simple permanent closure of this spur while equipment is in the area for the Canyon Creek decommission would pay off handsomely in significant natural resource benefits.

OPA is heartened that Olympic National Forest is embarking on this long-planned project. We express our gratitude to Forest staff, current and past, who have worked to arrive at this point. We look forward to seeing these restoration projects undertaken soon.

Sincerely,

Tim McNulty
Olympic Park Associates