

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

March 30, 2018

Re: OHS Road Geotechnical Investigation Scoping

Olympic Park Associates (OPA) acknowledges the need to establish permanent access up the Elwha valley that would accommodate the natural processes of the undammed Elwha River. The ecological restoration of Elwha River ecosystem has been the focus of nationwide attention, and members of the public deserve to be able to witness this ongoing process. We also acknowledge the need for park staff to have access to manage infrastructure and public use of the area. We look forward to considering a range of access alternatives in a future NEPA document.

We appreciate the opportunity to comment briefly on the scope of the geotechnical testing environmental assessment for this project. We are concerned that the only preliminary action alternative offered in the scoping letter (B) is inadequate to insure that significant adverse impacts are not created by the testing process.

Since the initial scope of geotechnical test drilling and the access roads it requires will strongly influence future decisions on the character and location of a possible new road up the Elwha Valley, we wish to share these thoughts early on in the scoping process.

We request that stringent parameters be placed on the extent of ground disturbance and vegetation removal -- including cutting of mature and old-growth trees -- in the environmental assessment. The Purpose and Need section of the EA is the appropriate place to address this. We suggest that the section be expanded as following (addition underlined):

The park's purpose in taking action is to assess subsurface conditions of the Olympic Hot Springs Road while minimizing impacts to soils, and vegetation with particular attention to forest trees. This action would determine the feasibility of the potential relocation of a portion of the road outside of the floodplain. The analysis of a potential relocation would occur in a subsequent environmental assessment that would address long-term planning for the Olympic Hot Springs Road.

We make this request in light of past Federal Highway Administration approaches to road construction in Olympic National Park, most notably the Sol Duc Road reconstruction project in 1985. There, the FHA proposed removing

4,000 mature and old-growth trees over two-feet in diameter along an eleven-mile corridor to accommodate a widened and straightened road. Ultimately, intervention on the director and regional director levels resulted in those plans being scrapped for an approach more consistent with a national park. We do not wish to see a similar approach pursued for a realigned Olympic Hot Springs Road.

This can best be accomplished through strict parameters in the testing EA that restrict the cutting of large trees and minimize cutting and filling of slopes to create a pioneer road wide enough to accommodate a large drill rig. We suggest that no cutting of trees 24 inches in diameter or larger be allowed. If there are smaller drill rigs that could be employed to work around old-growth trees, or that can be employed for excessively steep areas such as the slope above the temporary bridge, FHA should be required to use them.

Ultimately, a new road for travel in a national park forest should be of a scale consistent with the existing Hot Springs and Whiskey Bend roads. The scope and scale of geotechnical testing should reflect that.

Thanks you for your consideration.

Sincerely,

Tim McNulty
Olympic Park Associates