



April 17, 2017

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Re: Proposed Dungeness Watershed Roads Management Project

Thank you for the opportunity to provide comments on the scoping notice for the “Proposed Dungeness Watershed Roads Management Project” in the Hood Canal/Quilcene Ranger District. As conservation and recreation focused non-profit organization’s we have a strong interest in current and future management activities since our supporting members live, work and play in and around the Olympic National Forest. Please add our names and organizations to the contact list to receive any future public notices regarding this project.

We are very encouraged to see the Olympic National Forest considering watershed restoration on a large scale and address its road network: one of the keys factors that continues to undermine overall watershed health. This is especially true for the proposed components that preserve recreational opportunities, address water quality and aquatic habitats, improve watersheds and their resiliency to a changing climate. This is best achieved by reducing overall road density by decommissioning deteriorating and unneeded roads while also improving roads that are used to access our public lands; reducing the road network to the scale priority routes can be reasonably maintained given current and anticipated road budget.

We are aware of the many challenges the U.S. Forest Service faces with its oversized and under-maintained road system and have worked to help address some of the funding challenges. The agency’s road network was built decades ago - financed nearly 75% by federal appropriations - to support large-scale timber harvesting. Today, the road network continues to support forest management activities but also supports a strong recreation economy with at least 63% of Washingtonians participating in outdoor activities each year, generating \$1.6 billion in local and state taxes¹. But road budgets have not increased to keep up with this change. In fact, budgets have gone the opposite direction - dropping to 18% of what they were in 1990. The Forest Service is overwhelmed by significant management and ecological problems related to this deteriorating infrastructure. We recognize and support the need to make decisions to adapt to modern day recreational interests, historical and current tribal and cultural needs, while also reducing aquatic and

¹ Outdoor Industry Association. The Outdoor Recreation Economy FactSheet. 2012.

terrestrial impacts and lining up with realistic budgets. We appreciate your effort in working towards this balance.

We also recognize the work that the Dungeness Watershed Collaborative made towards identifying opportunities for watershed restoration a few years ago. Local citizens, county, city and state government, tribes and other stakeholders came together to learn more about the challenges and seek solutions. We encourage the agency to incorporate that work.

I. As part of its analysis of the Dungeness Watershed Roads Management Project under NEPA, the Forest Service should incorporate the finding and recommendations from the Olympic National Forest's Travel Analysis Report and identify the Minimum Road System.

The Forest Service faces many challenges and liabilities with its vastly oversized, under-maintained, and unaffordable road system. The impacts from roads to water, fish, wildlife, and ecosystems are tremendous and well documented in scientific literature. Given that the Dungeness Watershed Roads Management Project is considering changes to a number of miles of roads, and given its large geographic scale, this is precisely the type of project where the Forest Service should refer to the Travel Analysis Report (TAR) for the Olympic National Forest, and identify the Minimum Road System (MRS).² We urge the Forest Service to carefully evaluate the proposed project and its alternatives through this lens. This type of large-scale project is the perfect opportunity to begin making on-the-ground progress towards an economically and environmentally sustainable road network. Although the scoping notice provides little information at this point, it appears that there is at least some consideration of the 2015 Travel Analysis Report. We would encourage full incorporation into the Draft Environmental Analysis.

To address its unsustainable and deteriorating road system, the Forest Service promulgated the Roads Rule (referred to as “subpart A”) in 2001.³ The Roads Rule created two important obligations for the agency. One obligation is to identify unneeded roads to prioritize for decommissioning or to be considered for other uses.⁴ Another obligation is to identify the MRS needed for safe and efficient travel and for the protection, management, and use of National Forest system lands.⁵ The MRS is the road system, determined by the Forest Service, as needed to:

- Meet resource and other management objectives adopted in the relevant land and resource management plan,
- Meet applicable statutory and regulatory requirements,
- Reflect long-term funding expectations, and
- Ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.⁶⁷

² 36 C.F.R. § 212.5(b)(1) (“For each national forest . . . the responsible official must identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands.”).

³ 66 Fed. Reg. 3206 (Jan. 12, 2001); 36 C.F.R. part 212, subpart A.

⁴ 36 C.F.R. § 212.5(b)(2).

⁵ Id. § 212.5(b)(1) In promulgating its rules, the Forest Service indicated that “[t]he requirement to identify roads for decommissioning is ‘[e]qually important’ as the overall identification of the minimum road system.” *Center for Sierra Nevada v. U.S. Forest Service*, 832 F. Supp. 2d 1138 (E.D. Cal. 2011) (quoting 66 Fed. Reg. at 3207).

⁶ Id. (hereafter, MRS factors).

The goal of subpart A is “to maintain an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns.”⁸

The Forest Service’s Washington Office has issued a series of directive memoranda that outline how the agency expects forests to comply with subpart A.⁹ First, each forest was required to submit its TAR by September 30, 2015.¹⁰ The Olympic National Forest completed this component of the requirement in 2015. Next, pursuant to its own regulations and directive memoranda, the Forest Service should consider the valid portions of its TAR and begin to determine the MRS in its analysis of site-specific projects of the appropriate geographic size under NEPA.¹¹ By analyzing whether a proposed project is consistent with the relevant portions of the TAR, and considering the MRS factors under 36 CFR 212.5(b)(1), the Forest Service expects each forest to identify the MRS for particular forest segments.¹²

In addition, the Forest Service’s Regional Office issued a memorandum in September 2016 setting the expectation for progress towards establishing a sustainable road system.¹³ The Regional Office called on forests to ensure travel management proposals analyzed under the National Environmental Policy Act (NEPA) are addressed in the purpose and need statement *Id.* Actions do vary but the overall purpose is to develop “an environmentally sustainable MRS” *Id.*

Now is time for the Forest Service to take the next step under subpart A: identify the MRS through site-specific projects subject to NEPA.¹⁴ As you move forward with developing your draft Environmental Analysis, we urge you to consider the findings and recommendations from your Travel Analysis Report, identify the MRS, and incorporate appropriate actions that improve watershed and aquatic health in this area.

II. Re-evaluate the road related actions to ensure overall watershed health objectives are

⁷ See also Memorandum from Leslie Weldon to Regional Foresters et al. on Travel Management, Implementation of 36 CFR, Part 212, Subpart A (Mar. 29, 2012) (hereafter, 2012 Weldon Memo).

⁸ See 2012 Weldon Memo at 1 (“The national forest road system of the future must continue to provide needed access for recreation and resource management, as well as support watershed restoration and resource protection to sustain healthy ecosystems.”). See also Memorandum from Joel Holtrop, U.S. Forest Service Washington Office, to Regional Foresters et al. (Nov. 10, 2010) (hereafter, 2010 Holtrop Memo) (“Though this process points to a smaller road system than our current one, the national forest road system of the future must provide needed access for recreation and resource management and support watershed restoration and resource protection to sustain healthy ecosystems and ecological connectivity.”).

⁹ 2010 Holtrop Memo; 2012 Weldon Memo; Memorandum from Leslie Weldon, U.S. Forest Service Washington Office, to Regional Foresters et al. (Dec. 17, 2013) (hereafter, 2013 Weldon Memo) (supplementing and reaffirming the 2012 Weldon Memo).

¹⁰ See 2013 Weldon Memo.

¹¹ See 2012 Weldon Memo at 2 (directing forests to “analyze the proposed action and alternatives in terms of whether, per 36 CFR 212.5(b)(1), the resulting [road] system is needed”).

¹² *Id.* (“The resulting decision [in a site-specific project] identifies the MRS and unneeded roads for each subwatershed or larger scale”).

¹³ See 2016 James Peña memo. Monitoring Travel Management NEPA Decisions for the Minimum Road System. September 6, 2015. File code: 1950; 2300;770.

¹⁴ See 2012 Weldon Memo (“The next step in identification of the MRS is to use the travel analysis report to develop proposed actions to identify the MRS . . . at the scale of a 6th code subwatershed or larger. Proposed actions and alternatives are subject to environmental analysis under NEPA. Travel analysis should be used to inform the environmental analysis.”).

met and are in-line with economic constraints.

As forest road users and conservationists, we understand that a strategic reduction in road miles means better not less access. There are some roads that are already functionally closed, either due to washouts, lack of use, or natural vegetation growth. There are other roads that receive limited use and are costly to maintain or were built in the wrong location. It is our belief that resources can be better spent on roads we use frequently than to spread resources so thin to all roads, so that these useful roads degrade even further. This is why we support the careful analysis and decision to decommission or close specific roads.

The National Forest road system is in a serious state of disrepair. The Olympic National Forest is no exception, with nearly 2,020 miles of system roads (nearly the distance from Seattle to New York City), the required maintenance need of \$2.7 million per year (plus \$210,000 per year for oversight and admin) which far exceeds annual maintenance budget of \$550,000 per year.¹⁵ This results in a significant backlog of deferred maintenance needs of over \$85.5 million on this forest. The existing road system is not reflective of current or long-term funding expectations and is not sustainable.

According to the Scoping Notice, the agency is analyzing options for 33 roads, but it is unclear how many total road miles this is. The current proposal suggests that 16.12 miles of high risk, unneeded roads would be decommissioned, 13.89 miles of road would be put in storage, the Gold Creek trailhead would be relocated, 1.41 miles of road would be converted to trail, and 1 roadway would have additional protections for the habitat of the Taylor's Checkerspot butterfly (an ESA listed endangered species). We assume the remaining roads would be open and continue to provide access to the public in order to use trailheads, campgrounds, dispersed campsites, etc. Though there is a map with the scoping notice, we would appreciate seeing more detail in the Draft Environmental Assessment on if/how the road segments currently accessing important recreational infrastructure could change.

Since we expect to see more information in the draft EA, we offer the following recommendations related to watershed health and economic constraints:

- how the project reduces overall road density in this area resulting in specific benefits to terrestrial and aquatic species and water quality, and aquatic ecological functions ;
- how the project helps bring the road system in alignment with your road maintenance budget;
- whether there are any unauthorized or user-created routes in the project area that are impacting ecological functions, habitat, or species and should be identified for treatment or restoration;
- whether there are barriers to fish passage – either resident or anadromous fish – that should be overcome (consider also steelhead and other critical habitat);
- and a detailed rationale for and description of the roads that will be upgraded or improved during project implementation and the sequence for restoration and maintenance.

II. Identify priority recreational access routes to be retained and improved

¹⁵ Olympic National Forest Travel Analysis Report, July 2015

The area encompassing the Dungeness Watershed Roads Management Project includes popular hiking, horseback riding, mountain biking, climbing, kayaking, hunting, winter recreation, dispersed camping and fishing opportunities. Given the popularity of the areas, a number of roads provide important access opportunities to trailheads and campgrounds. These important roads should be scored highly as to their benefits in a sustainable roads system and given significant consideration for retention and dedicated maintenance.

We are pleased to see the project includes the option of converting 1.41 miles of road to trail. We understand the costs associated with such an action, not only for the conversion, but also for future trail maintenance. However, we support this activity where it makes sense. The Olympic National Forest, in particular, has made excellent use of this tool. For example, Pine Lake in the Skokomish watershed, an extension of the West Fork Humptulips Trail and Lower Gray Wolf trail in the Dungeness watershed. Road to trail conversions also garner significant public support.

The scoping notice suggests a relocation of trailheads. We would like to see more information related to these relocations outlined in the draft EA. For Gold Creek, from our understanding of the area, the road has experienced significant road failures and landslides given its location on an unstable slope. However, this trailhead is popular for mountain bikers, climbers, hikers, and horseback riders. We expect to see a detailed description of how these users will continue to access this area, including horse trailer parking at the new trailhead parking lot.

The following are roads (note: not an exhaustive list) within the Dungeness project area that provide access to recreation sites. Within the draft EA, we would like to see information on how access to recreation areas is preserved or enhanced.

- Forest Road 2870: Accesses the Tubal Cain, Dungeness Upper and Royal Basin trails and provides access to many miles of trails through trail connections to Mt. Townsend, Marmot Pass and Constance Pass.
- Forest Road 2870-230: Access the Gold Creek / Dungeness Lower trails and provides access to many miles of trails through trail connections to Mt. Townsend, Silver Lakes and Big Quilcene.
- Forest Road 2870-270: Access to the Maynard Burn trail and rock climbing on Tyler Peak.

III. Provide detailed description of how “high risk” roads will be addressed – both by road improvements on needed roads and decommissioning of unneeded roads - and whether there are any changes to road objective maintenance levels.

The Olympic National Forest Travel Analysis Report determined, across the forest, which roads are “high risk” for aquatic and terrestrial resources. If these “high risk” roads have “low benefit” (i.e. public access and forest management), then they should be decommissioned. If these “high risk” roads have “high benefit”, then they should be a focal point for strong maintenance, stormproofing, BMP installations or other actions to mitigate the aquatic impacts on the watershed. Measures need to be taken that ensure the risks to aquatics is eliminated or significantly reduced to be inconsequential. “Medium risk” roads should not be overlooked, either. For years, the Forest Service has failed to meet its obligations under the Clean Water Act and Washington’s Forest and Fish

Regulations for addressing water quality impacts from roads¹⁶. Now that the risk information is available and analyzed, we would expect to see actions to address the problem areas identified with the goal of minimizing adverse environmental impacts.

In our attachment to these comments (Attachment A), we have included a map for the Quilcene Ranger District (which is larger than the project area) that was created using information from the Olympic National Forest's Travel Analysis Report. The GIS analysis that led to the creation of the map shows that there are 76.7 miles of unneeded roads in this district, 47 miles of which are high risk to aquatics. In addition, there are 242.9 miles of needed roads in this district, 163 miles of which are high risk to aquatics. With a project such as this – which aims to improve watershed health – we will expect to see how proposed actions will reduce those risks from both needed and unneeded roads. Some of the key access roads (such as FSR 2880) are also roads that cause harm to aquatics. We use these roads to access many trails in this area, but we also believe that improvements can be made to reduce and eliminate impacts and improve vehicle access.

In the Draft EA, we recommend that the Agency take a second look at risk analysis from the Travel Analysis Report to determine if there are additional high/medium risk roads with low/medium benefit that should be considered for closure or decommissioning. In addition, the specific measures that will be used to eliminate and/or reduce the “high risks” should be clearly outlined. To the extent that the final decision in this project differs from what is recommended in the Travel Analysis Report, the Forest Service should provide an explanation for that inconsistency. In some EA's in other forests, we have seen agency staff provide a crosswalk between project recommendations and TAR recommendations, which is an effective communication approach we urge you to take.

The Forest Service should prioritize road decommissioning in this project to enhance landscape connectivity and ecological integrity based on:

- Effectiveness in reducing fragmentation, connecting un-roaded and lightly-roaded areas, increasing large contiguous old forest habitat areas, and improving stream segments, with a focus on inventoried roadless areas, key watersheds, and other sensitive ecological and conservation areas and riparian corridors;
- Benefit to species and habitats, including restoring aquatic and terrestrial habitats and habitat connections, and aquatic ecological functions;
- Addressing impaired or at-risk watersheds;
- Achieving motorized route density standards; and
- Enhancement of quiet recreation experiences.

The Forest Service should use the National Best Management Practices for Water Quality Management on National Forest System Lands (Volume 1, April 2012) to guide road management in determining the MRS. The BMP program “was developed to improve agency performance and accountability in managing water quality consistent with the Federal Clean Water Act (CWA) and

¹⁶ The USFS signed a Memorandum of Agreement with the Washington State Department of Ecology to meet responsibilities under the Federal and State Water Quality Laws in 2000. By 2005, all Forest Service roads in Washington State should have had completed (1) road management plans based on road analysis or road assessments to determine water quality effects and (2) an implementation schedule to address those issues.

State water quality programs” and “[c]urrent Forest Service policy directs compliance with required CWA permits and State regulations and requires the use of BMPs to control nonpoint source pollution to meet applicable water quality standards and other CWA requirements.” National Best Management Practices. It directs forests to:

- Design the transportation system to meet long-term land management plan desired conditions, goals, and objectives for access rather than to access individual sites.
- Limit roads to the minimum practicable number, width, and total length consistent with the purpose of specific operations, local topography, geology, and climate to achieve land management plan desired conditions, goals, and objectives for access and water quality management.

The Forest Service should continue working to reduce sediment delivery from roads, improve or remove road crossings, and close or decommission roads that cannot be adequately maintained.

IV. The Forest Service should consider climate change impacts and forest roads.

A robust analysis under NEPA of the forest road system and its environmental and social impacts is especially critical in the context of climate change. As the CEQ’s recent draft guidance on addressing climate change in NEPA analyses recognizes, “[c]limate change can increase the vulnerability of a resource, ecosystem, human community, or structure, which would then be more susceptible to climate change and other effects and result in a proposed action’s effects being more environmentally damaging.”¹⁷

With an anticipated increase in violent storms, rain on snow events, and rain instead of snow, climate change intensifies the adverse impacts associated with roads. The Forest Service should consider the risk of increased disturbance type and intensity when analyzing this proposed project. For example, as the warming climate alters species distribution and forces wildlife migration, landscape connectivity becomes even more critical to species survival and ecosystem resilience.¹⁸

The Olympic National Forest in particular has been on the forefront with climate change impacts analysis. The PNW Research Station published: “Adapting to Climate Change at Olympic National Forest and Olympic National Park” in 2011. Not only is there a vulnerability section in this report but there are also clear recommendations for adaptation. In particular, there is a strong roads component, since roads are a major vulnerability under any climate change scenario. We strongly recommend the Olympic National Forest use its own data to improve the analysis in this section, which then should translate to road management changes in the preferred alternative.

The President’s Executive Order 13,653 (Nov. 2013) provides direction on “Preparing the United States for the Impacts of Climate Change.” The Order recognizes that “[t]he impacts of climate

¹⁷ CEQ, Revised Draft Guidance for Greenhouse Gas Emissions and Climate Change Impacts (Dec. 18, 2014), page 22.

¹⁸ Exhibit C at 9-14. See also USDA, Forest Service, National Roadmap for Responding to Climate Change at 26 (2011), available at <http://www.fs.fed.us/climatechange/pdf/Roadmapfinal.pdf> (recognizing importance of reducing fragmentation and increasing connectivity to facilitate climate change adaptation).

change – including an increase in prolonged periods of excessively high temperatures, more heavy downpours, an increase in wildfires, [and] more severe droughts . . . – are already affecting communities, natural resources, ecosystems, economies, and public health across the Nation. ¹⁹Agencies also should develop and implement adaptation plans that “evaluate the most significant climate change related risks to, and vulnerabilities in, agency operations and missions in both the short and long term, and outline actions . . . to manage these risks and vulnerabilities.”²⁰

The Forest Service’s 2014 adaptation plan recognizes that the wide range of environmental and societal benefits provided by our national forests “are connected and sustained through the integrity of the ecosystems on these lands.”²¹ With respect to transportation infrastructure specifically, the adaptation plan recognizes that, “[w]ith increasing heavy rain events, the extensive road system on NFS lands will require increased maintenance and/or modification of infrastructure (e.g. larger culverts or replacement of culverts with bridges).”²²

Conclusion

The Forest Service’s current road system is oversized and deteriorating with each passing storm. We strongly believe that smart decisions can be made to maintain and improve roads that are crucial for accessing recreational destinations while also removing roads that are unneeded and causing harm, downscaling the road network to be commensurate with available maintenance funds. We applaud the work the Olympic National Forest has done with their Travel Analysis Report and with the Dungeness Collaborative group effort, which we feel can add to this analysis. Identifying a sustainable road network is one of the most important endeavors the Forest Service can undertake to restore aquatic systems and wildlife habitat, facilitate adaptation to climate change, enhance recreation, and lower operating expenses. As noted in the beginning of our letter, we do support increasing the pace of restoration activities to implement a right-sized road system. This is incredibly important and long overdue.

Please add us to your project notification list and if you have questions, feel free to contact us.

Regards,

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¹⁹ .” Id. § 3.

²⁰ Id. § 5(a).

²¹ See USDA Forest Service, Climate Change Adaptation Plan, page 58 (2014)

²² Id. at 62.

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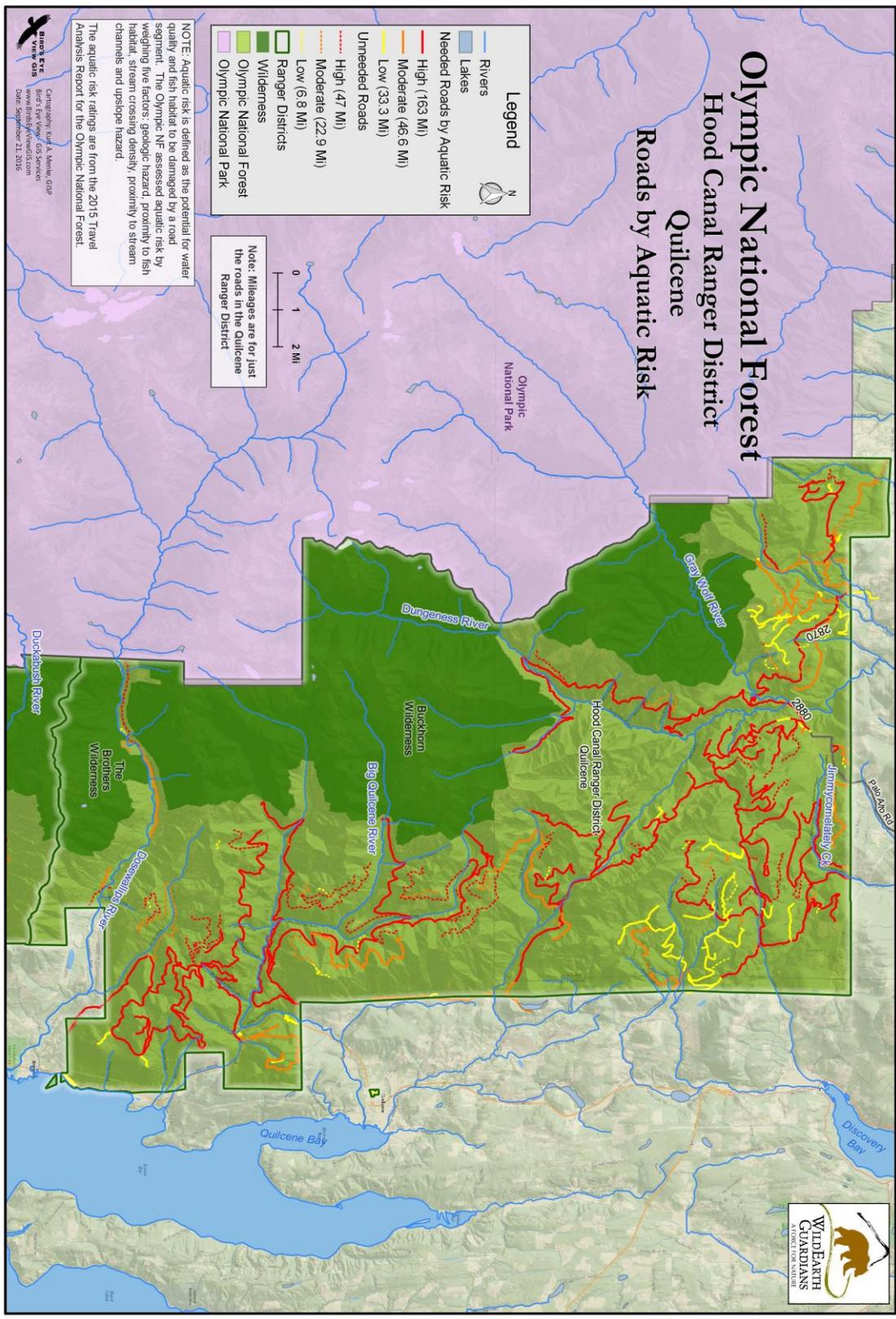
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Attachment A: