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Sent via email to:

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Re: Preliminary Environmental Assessment - Dungeness Watershed Roads Management Project

Dear District Ranger Lau and Mr. Butler,

Thank you for the opportunity to review and provide comments on your preliminary Environmental Assessment (EA) for the “Dungeness Watershed Roads Management Project” in the Hood Canal/Quilcene Ranger District. We are encouraged to see the U.S. Forest Service (USFS) move forward with recommendations proposed through a collaborative process in the 2016 Dungeness Watershed Action Plan while also including findings from the 2015 Travel Analysis Report, field reviews, and professional knowledge from the USFS InterDisciplinary Team to improve aquatic resources.

The Dungeness watershed is the homewaters for Chinook salmon, coho salmon, chum salmon, pink salmon, steelhead, resident rainbow trout, sea-run and resident cutthroat trout, bull trout, Dolly Varden, pacific lamprey and sculpin (Dungeness Roads Management Project – Preliminary EA (DRMP EA), p. 40). Chinook salmon, summer chum salmon, bull trout and steelhead are all listed as “threatened” under the Endangered Species Act. Critical habitat for Chinook and steelhead includes the entire Dungeness River from the mouth up into the Olympic National Park. Yet these species are not on a trajectory towards recovery.

We applaud the Olympic National Forest (ONF) for recognizing the need to advance aquatic restoration for these species in collaboration with tribal governments and local stakeholders through this plan. This action is long overdue. In 1999, when Washington’s Forest and Fish Law was passed, state and private forest landowners proceeded to address their forest roads through the development and implementation of Road Maintenance and Abandonment Plans. By 2015, most had met the requirements of the law. By contrast,

similar achievement on U.S. Forest Service lands has been slow.¹ This lack of action on federal lands, places the investments in road work and salmon restoration on adjoining lands at risk.

As a result, the Forest Service struggles to deal with a nearly \$3 billion road maintenance backlog on the more than 370,000 miles of Forest Service system roads nationwide. Many of our organizations have joined with the Washington Department of Ecology, Washington Department of Natural Resources and Washington Department of Fish and Wildlife through the Washington Watershed Restoration Initiative to support the more than \$300 million investment of federal funding over the last decade to address legacy road problems through the Legacy Roads and Trails program.

The Dungeness watershed also provides a wealth of diverse recreational opportunities including hiking, biking, horseback riding, climbing, camping, backpacking, even a rental cabin. With access to wilderness areas, national park, wild rivers and 77 miles of trails – this is an area loved by locals and visitors alike. Our organizations believe in a balanced approach that includes prioritizing roads that reliably access official trails, campgrounds and other economic infrastructure while also addressing high aquatic risks and watershed threats from legacy roads on the system.

We support the Olympic National Forest in considering watershed restoration on a large scale by addressing one of the keys factors that continues to impact overall watershed health – the deteriorating road system. Activities associated with Alternative A move the forest closer to realizing these objectives. The Dungeness roads project area comprises 106,856 acres of the Olympic National Forest. 158 miles of National Forest System roads were evaluated with actions proposed on 35 miles (15.9 miles proposed for decommissioning, 14.1 miles proposed for closure and 1.4 miles proposed for road-trail conversion – under Alternative A) (DRMP EA, p. 15). Please note that there are some confusing tables in the document so it is unclear how many of the roads are currently closed or are ML2 (DRMP EA p.15, p.114).

We also provide the following comments:

- I. We are pleased to see that the Forest Service incorporated the findings and recommendations from the Olympic National Forest’s Travel Analysis Report. However, the agency failed to clearly identify the Minimum Road System.**

As we noted in our scoping comments, in 2001 the Forest Service promulgated the Roads Rule (referred to as “subpart A”) 66 Fed. Reg. 3206 (Jan. 12, 2001); 36 C.F.R. part 212, subpart A. The Roads Rule created two important obligations for the agency. One obligation is to identify unneeded roads to prioritize for decommissioning or to be

¹ Memorandum of Agreement between the USDA Forest Service, Region 6 and the Washington State Department of Ecology Meeting Responsibilities Under Federal and State Water Quality Laws (2000).

considered for other uses. 36 C.F.R. § 212.5(b)(2). This is what the Olympic National Forest accomplished with their 2015 Travel Analysis Report. Another obligation is to identify the Minimum Road System (MRS) needed for safe and efficient travel and for the protection, management, and use of National Forest system lands. *Id.* § 212.5(b)(1).² 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.

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.”³ 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.⁴ It is not clear from the preliminary EA what has been determined as the minimum road system for this area.

Besides all the rules, regulations and direction that tell the agency it needs to create a more sustainable road system, one of the biggest challenges is the economic reality. There are 158 miles of road in this project area needing \$3.4 million a year just for annual maintenance and another \$50 million investment just to bring them up to standard (DRMP EA, p. 115-116). Yet, the road budget for the Olympic National Forest was \$552,000 in 2015 for over 2,000 miles of roads. Costs to implement the treatments to 35 miles of road are \$2.5M for Alternative A and \$1.96M for Alternative B which then would pay back with reductions in deferred maintenance of \$1.1M (DRMP EA, p. 117-118). This also does not include costs avoided when storms plug culverts or wash out roads. 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 terrestrial impacts and lining up with realistic budgets.

² 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).

³ 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.”).

⁴ 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).

We appreciate your effort in working towards this balance. But there is still a long ways to go. Even after full project implementation, there will still be a need for tens of millions in deferred maintenance and several million for annual maintenance just in this watershed. Unless budgets are significantly increased, we will lose more roads due to neglect and storms then to any other action. It's imperative that the Forest Service continue to identify key roads for key investments as well as unneeded roads that can be removed from the system to truly become more economically sustainable.

II. We support the projects' purpose and need of improving watershed conditions by addressing the roads that are a high risk to aquatics. However the Preliminary EA should be more specific in how aquatic risks will be reduced from both needed and unneeded roads.

The Forest Service's Regional Office issued a memorandum in September 2016 setting the expectation for progress towards establishing a sustainable road system.⁵ In addition, 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 transportation system *Id.* This is what the Olympic National Forest did through their need statement:

“There is a need to consider actions on roads that are currently impacting or are at a high risk of impacting forest resources through erosion and fill failures.”
(Dungeness Roads Management Project – Preliminary EA, p. 7).

This is also precisely the place for this type of project and associated actions to occur. Some key reasons why aquatic restoration is so critical for the Dungeness watershed:

- a USFS “Focus” or Priority Watershed (DRMP EA p. 7)
- a municipal watershed and “...when conflicts exist between watershed management and other resources, the conflict should be resolved in favor of the watershed resource.” (DRMP EA p.7)
- essential for species listed as “threatened” under the Endangered Species Act: Chinook salmon, summer chum salmon, bull trout and steelhead (DRMP EA p. 40)
- essential for other culturally and economically important aquatic species: coho salmon, pink salmon, resident rainbow trout, sea-run and resident cutthroat trout, Dolly Varden, pacific lamprey and sculpin (DRMP EA p. 40)

In addition, the “project area falls into an area that was ceded to the United States under the Treaty of Point No Point. The modern tribes descended from the original signatories of the treaty include the Lower Elwha, Jamestown S’Klallam, Port Gamble S’Klallam and Skokomish. Article 3 of the treaty reserved to the tribes the right to fish at all usual and accustomed grounds and hunting and gathering on open, unclaimed lands” (DRMP EA

⁵ See 2016 James Peña memo. Monitoring Travel Management NEPA Decisions for the Minimum Road System. September 6, 2015. File code: 1950; 2300;770.

p.121). To exercise their treaty right to fish, there also needs to be healthy and abundant fish available. Natural-origin Chinook salmon returns are dangerously low (see Table 3.10).

The health of the upper watershed also has a direct correlation to the lower watershed, where there have been problems with flooding of properties and insufficient water in-stream. And the Dungeness bay, critical for shellfish harvesting, also is impacted positively or negatively by what occurs in the watershed and river.

It is good to see that Alternative A proposes to decommission 16 miles of road (4.7 miles are high-risk to aquatics) and store 15 miles (11.7 miles are high-risk to aquatics) (DRMP EA p.36 and 42). However, it is unclear in the Preliminary EA what activities are being proposed for ALL high or medium aquatic risk roads in this project area. In our scoping comments, we noted that over 60% of the unneeded roads and over 65% of the needed roads in the Quilcene Ranger District (which is larger than the project area) are high risk to aquatics. With a project such as this – which aims to improve watershed health – we expect to see how proposed actions will reduce those risks from both needed and unneeded roads. Almost all of the key access roads (such as FSR 2880, 2840, 2870, 2875, etc.) are also roads that cause harm to aquatics. These roads are used by many to access many trails in this area, but we also believe that improvements can be made to reduce the aquatic impacts, protect these key roads from storm-damage and improve vehicle access. 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 roads⁶. As we stated in our scoping comments, now that the risk information is available and analyzed, we would expect to see actions outlined to address the problem areas identified with the goal of minimizing adverse environmental impacts.

An identified “need” of the project is “a need to consider actions on roads that are currently impacting or are at a high risk of impacting forest resources through erosion and fill failures” (DRMP EA p. 7). However, the Preliminary EA focuses on the roads to be closed or decommissioned, which is clearly an important step, but fails to adequately discuss or identify remedies for the roads that will remain open. To be clear, we are not advocating that these key access roads be closed. We are suggesting that the EA should include options to address aquatic risks associated with roads that are intended to remain open for access reasons.

III. The Forest Service should include a monitoring plan and monitoring activities to ensure project goals are met.

One challenge with ground disturbance activities is the possibility for invasive weeds. We would ask the Forest Service include measures to ensure Best Management Practices (BMPs) are followed by the agency and contractors to help protect against additional spread of

⁶ 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.

invasive weeds. Native vegetation should be planted as soon as possible. And the agency should develop and follow a schedule to monitor the sites for any establishment of noxious weeds. Particularly important are the first few months and years after ground disturbing activities.

In addition, the Forest Service needs to monitor for unauthorized motorized use on the closed or decommissioned roads in order to ensure aquatic benefits can be fully realized by the treatments. If any intrusions are identified, then additional measures should be immediately implemented to eliminate further incursions and prevent further damage.

IV. We support Alternative A's decommissioning treatments, which will have greater positive results on fish habitat and water quality, and suggest additional roads for decommissioning.

The Preliminary EA for this project provides some information on the benefits of decommissioning treatments over closure such as:

- Soil productivity: Alternative A has a 56% potential increase while Alternative B has a 19% increase
- Soil stability: Alternative A has a potential 99.5% increase while Alternative B has a 96% increase
- Landslide risk: "Alternative A would treat approximately 28 miles of existing road prisms within landforms (see Affected Environment section) that exhibit high geologic risk for both potential landsliding and high volume sediment delivery to live water if failure occurs." (DRMP EA p.55)
- Elk/deer impacts: "The Washington Department of Fish and Wildlife (1996) recommends that road densities be kept below 1.5 mi/mi² mile in elk summer/fall range and below 1.0 mi/mi² mile in winter/spring range" (DRMP EA p. 91). Though these road density recommendations won't be met with the alternatives proposed with this project, there will be some benefits achieved.

To maximize these benefits, however, proper implementation and vegetation planting will be key.

It will take an investment to complete these treatments but the costs will pay for themselves in the long run with savings in deferred maintenance (DRMP EA p.118), savings in storm damage repairs, improvements to fish habitat, and local jobs for restoration contractors.

Decommissioning treatments have been analyzed and proven to be more effective than closing treatments. The USFS Rocky Mountain Research Station has monitored road decommissioning and road storage projects since 2009 across sites in the west, including the Skokomish watershed in the Olympic National Forest. Measurements were taken before/after road treatments and the improvements were significant.

- 70% reduction in road/stream connectivity
- 81% reduction in sediment delivery to streams (from 27.1 tons/year to 5.2 tons/year)

- completely eliminated risk of stream crossings becoming plugged
- 98% reduction in drain point problems⁷

Other studies also show significant improvements with road decommissioning:

- **hydrologic recovery is speedier.** Lloyd et. al. (2013)⁸ discovered that when a road is recountoured and the surface is adequately treated, rainwater infiltrates quicker than when a road is simply abandoned. (Above ground recovery is about the same but below ground is very different.) Kolka & Smidt (2004)⁹ also discovered that there is less erosion/runoff on treated roads.
- **reduced sediment delivery to streams.** Nelson et. al. (2012)¹⁰ compared sediment delivery rates on decommissioned roads and storm proofed roads. After storms, the decommissioned roads had 80% less sediment delivery while storm proofed roads had 67% less sediment delivery.
- **results in higher watershed condition scores.** An Aquatic Conservation Strategy analysis completed in 2006 showed that the watersheds that had condition scores that increased the most were the ones that had the most extensive road decommissioning.
- **increased wildlife benefit.** Extensive studies show that wildlife (particularly elk, bear, lynx) avoid roads. Switalski et. al. (2011)¹¹ published a study showing that black bears are going to areas where roads were decommissioned in significantly higher numbers than areas where roads were simply closed (with gates or barriers).

Given these significant benefits from road decommissioning and the stated purpose of this project, we also ask that decommissioning of the 2875-150 road be extended to the Lower Gray Wolf subwatershed and the spurs off of 2877 (100, 140, 150 and 160). None of these road spurs access developed recreational facilities like trailheads or campgrounds. Yet, these spurs were identified to be high risk to aquatics in the Olympic National Forest Travel Analysis Report. Based on the topography in these areas including creeks, we would expect that further decommissioning treatments would reduce motorized intrusions in fragile areas and improve watershed conditions. It is also unclear why some of the spurs (030, 034, 035...) off of the F2840 in the upper elevations were not considered for closure or decommissioning. These were also identified as high risk to aquatics and ask that project staff provide explanation of how these risks will be reduced.

⁷ Legacy Roads and Trails Monitoring Project - Road decommissioning in Skokomish River watershed, Olympic National Forest. USFS Rocky Mountain Research Station and USFS Pacific NW Region. September 21, 2009.

⁸ Influence of road reclamation techniques on forest ecosystem recovery. Lloyd, Rebecca A., Kathleen A. Lohse and TPA Ferre. *Frontiers in Ecology and the Environment*. March 2013.

⁹ Kolka, R., and M. Smidt. 2004. Effects of forest road amelioration techniques on soil bulk density, surface runoff, sediment transport, soil moisture and seedling growth. *Forest Ecology and Management* 202: 313–323.

¹⁰ Nelson, N., T. Black, C. Luce, and R. Cissel. 2012. Legacy Roads and Trails Monitoring Project Update. US Forest Service, Rocky Mountain Research Station, Boise, ID. 5 p.

¹¹ Switalski, T.A. and C.R. Nelson. 2011. Efficacy of road removal for restoring wildlife habitat: black bear in the Northern Rocky Mountains, USA. *Biological Conservation* 144: 2666-2673.

V. We are pleased to see that priority recreational access routes will be retained and improved.

The expansion of trailhead parking areas at the Tubal Cain trailhead is long overdue, since this parking area is often full, so cars (and even some horse trailers) resort to parking along the shoulder of the 2870. This location makes sense for an expansion because numerous trails launch from this area including trails up to the Buckhorn wilderness, down the Dungeness river valley, and over to Mt. Townsend. Doubling this parking lot and accommodating horse trailers will be helpful (DRMP EA p. 8). From the basic drawings incorporated in the Preliminary EA, it looks like this expansion can occur using the old roadbed with minimal impacts to natural resources.

At this point, the non-system trail to Silver Lakes will not be decommissioned, from what we understand, and access will still be feasible from the two other system trails. We encourage the Forest Service to really examine the use and impacts to Silver Lakes and Silver Creek, which directly flow into the Dungeness River, sometime soon.

Moving the trailhead parking lot at Gold Creek also appears to make sense while converting the road to trail to continue access. Road to trail conversions have been completed successfully in other parts of the forest. We applaud the Olympic National Forest for considering this tool when other forests sometimes do not. It's well-understood that a significant portion of this area is highly unstable geology – thus investing now in an improved area that will (hopefully) last into the future makes sense. It was stated in the Preliminary EA that horse trailers will be accommodated in an expanded parking area providing a benefit to the largest user groups of this area, including mountain bikes and equestrians.

We support the Forest Service's work to protect species that have been listed on the Endangered Species list. The Taylor's Checkerspot Butterfly is listed as "endangered" and is considered to be in imminent danger of going extinct. There are only fourteen known populations in Washington and Oregon (when there used to be over 70) (USFWS). As of 2016, the butterfly only occupied eight sites in Washington – of which 7 are in Clallam County (WDFW 2016)¹². It is our understanding that the Proposed Alternative (Alt. A) will include activities and actions that support long-term safe butterfly habitat that are not limited to road surfaces open to impacts from motor vehicle use. The Preliminary EA identifies the need to protect this endangered species and also identifies this area as a unique recreational location with access to climbing opportunities at Tyler Peak. Are there other possibilities for the Forest Service to create a different access route that avoids impacts to this endangered species?

¹² Potter, A. E. 2016. Periodic status review for Taylor's Checkerspot in Washington. Washington Department of Fish and Wildlife, Olympia, Washington. 16+iii pp.

VI. The inclusion of limited climate change information is helpful, though specific details and actions are lacking.

Climate change intensifies the adverse impacts associated with roads. This watershed in particular is considered a transient watershed where it is expected that significant increases in winter and spring peak streamflows and decreases in summertime flows will occur¹³. This project – which has a strong focus on hydrology and aquatics – seems to have missed an opportunity to evaluate whether more actions were needed to address these changing conditions. In particular, stream-crossings and culverts are key points of vulnerability. This was not incorporated as part of the assessment, which was a significant missed opportunity. How many undersized or failing culverts are on the 158 miles of roads? How resilient are the stream crossings to increased peak flows? The way roads are managed now and into the future will impact watershed health but also how we are able to access National Forests.

Conclusion

We applaud the effort made to protect aquatic resources and protect road access in the Dungeness watershed. We are pleased to see that the Olympic National Forest has used their Travel Analysis Report and work from the Dungeness Collaborative group to focus their proposed actions in this area. 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.

If you have questions, feel free to contact us.

Regards,

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¹³ Adapting to Climate Change at Olympic National Forest and Olympic National Park, 2011.

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