



August 18, 2008

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Dear Supervisor Hom,

Thank you for the opportunity to comment on the Dosewallips Road Washout Project Draft Environmental Impact Statement (DEIS). Washington Trails Association (WTA) represents 9,000 members and volunteers statewide and is the primary hiker advocacy organization in Washington. As such, we sometimes comment on Forest Service projects. We are writing today to express our concerns regarding the alternatives proposed to reroute or bridge the Dosewallips Road washout.

As you know, WTA initially supported rebuilding the Dosewallips Road in place. We deeply value the recreation opportunities available at the upper end of the Dosewallips valley, and we understand how important it is to provide day use access to such special places. We reluctantly changed our position on that option after the National Marine Fisheries Service (NMFS) released its draft jeopardy position on returning Chinook salmon. At that time, we expressed the desire to see the Dosewallips Road replaced with a trail into Olympic National Park.

Since that time, we have heard from many WTA members and other hikers who would like to see the Dosewallips Road reopened for vehicle traffic, and some who would like to see it remain closed. Initially, our membership was split in their reactions to the washout. In the months just preceding the publication of the DEIS and since, we've heard from members on both sides of the issue. Both sides have made cogent arguments that have informed our deliberations and our review of the DEIS.

Unfortunately, reviewing the DEIS has not allayed our concerns about the long-term disposition of the Dosewallips Road and watershed. We were disappointed to note the absence of a road-to-trail alternative, and we have very significant concerns about the ability of the proposed reroutes to withstand the weather and geological conditions that prevail on the east side of the Olympics. In the following paragraphs, we will address our thoughts on each of the alternatives and finish by proposing a challenging but potentially fruitful long-term course of action for hiker access to the east side of the Olympics.

Alternative A

While we recognize the constraints of the stated project objective to restore vehicular access, we disagree with such a narrow investigation of alternatives. If Alternatives B, C, and F prove unfeasible (as we think they are), the Forest Service has not provided enough information about what our options would be in the face of the road not being rebuilt. What decommissioning work would need to happen, both in terms of the road and the facilities sited further up valley? What would be the administrative impacts of limited motorized access to the lower portion of the valley? The "no action" alternative is not a viable alternative. It does nothing to resolve the question of long-term recreation access and administration in the Dosewallips valley.

Alternative B

Our concerns about Alternative B are several. Having walked the proposed reroute, we're fairly confident of the more westerly reaches of the bench. Up on the bench, the slopes are less severe, the soil is more dry and the route less narrow. As we drew closer to the eastern section, however, we noted more water on the hillside from a number of small streams and seeps. Additionally, sideslopes began to steepen and old growth forest predominated. We also found more loose soil underfoot, making hiking this section a much more challenging prospect.

In the course of several conversations with Federal Highways, we have come to better understand the stability problems along the Alternative B reroute. This alternative traverses areas that are wet, unstable and steep. In the absence of exploratory drilling to determine soil composition, we cannot say with confidence that the reroutes run over bedrock. This concern comports with the analysis of the DEIS:

“Alternative B would have the second highest risk of slope instability (Alternative C would be slightly higher) of the action alternatives. Along Segment 2 historic shallow landsliding and dormant deep-seated mass movement are evident. Steep slope angles, unstable soils, and considerable surface and subsurface water flows are factors that make this location susceptible to instability. Slope failures within the cutslopes would likely compromise the road drainage system. Such blockages, culvert plugging, or diversion are a common cause of road-related instability and resulting watershed impacts. The potential for the cutslopes to expand in size upslope somewhat beyond the designed top of cut is high, at least in some localized areas in segments 2 and 5.”
(Dosewallips Road Washout Project DEIS, p. 81)

Given what we perceive to be very real concerns about the slope stability along the proposed reroute, we cannot support Alternative B as a responsible use of scarce public dollars, particularly since the upper edge of the road is so close to the Buckhorn Wilderness boundary. This leaves virtually no space to maneuver if the road should wash out in its new alignment. Spending millions of dollars and taking out large stands of old growth trees to reroute a road to an alignment in which we have little confidence does not strike us as prudent decision-making.

Alternative C

Very little needs be said about this alternative that we have not already said about Alternative B, save that it is more expensive—by roughly \$1.2 million—and potentially more unstable. We are unable to support this option. While the use of retaining walls shaves .6 acre from the footprint of the proposal, that minimal reduction is offset by dramatically higher costs and an increased probability of failure.

Alternative F

Bridging the Dosewallips washout strikes us as a precarious option. Since the initial damage in 2002, the washout has expanded in size by 200 feet. The Olympics continued to be hammered, season after season by heavy rains and flooding. We have no confidence that a bridge can be built that would not eventually become unsafe due to continued slope erosion and flooding. At the very least, the \$8.75 million cash outlay for this option is very large, and we believe that long and short term maintenance costs will be significantly larger than estimated. The worst-case scenario is total loss of the bridge, since the Dosewallips River clearly intends to occupy the road matrix in the long term.

Conclusions

While we recognize that there are strong views on both sides of this issue, we cannot support any of the options proposed for the Dosewallips Road. We understand the significant pressure that Olympic National Forest is experiencing to reopen vehicular access to the Dosewallips. That said, we feel the both the Olympic National Forest and the Park need to rethink their approach to access into the Olympics on the east side of the mountains. Sites that might provide the same level of recreation opportunity and park availability include the Hamma Hamma and Dungeness drainages—although we realize that they are not without their challenges. Both road systems are home to developed campgrounds and approach Olympic National Park, providing much-needed day access that might be further developed to the benefit of Olympic National Forest and Olympic National Park, as well as the recreating public.

We encourage you to analyze in detail other options, including a road-to-trail alternative, investigating in detail the costs and impacts of pulling culverts and structures, repairing tread and resiting recreation facilities such as parking and camping below the washout. Please also examine other existing roads that may traverse more stable terrain. And think critically about the needs of hikers on the east side of the Olympics. Day hikes are becoming more and more popular. Please examine other potential opportunities to enter the Park's high country on dayhikes and combine these with ways to provide more frontcountry camping opportunities.

A new approach to recreation on the eastern edge of the Olympics is needed. Concentrating on the Dosewallips watershed as the only option for entering and enjoying the wonders of both Olympic National Park and Olympic National Forest approaches this situation narrowly and ignores the changing realities of climate, terrain, and recreation demand. Hikers and the rest of the recreating public will be happier in the long term if we are provided with sustainable, cost-effective access—whether by foot or vehicle—to our precious wilderness resources.

Thank you again for the opportunity to comment on the Dosewallips Road Washout Project DEIS. We look forward to continuing this discussion and finding a solution that will work for the many people who enjoy the high Olympics and the Dosewallips valley. Please do not hesitate to contact me if you need clarification on any of the points we've raised in this letter, or if I may otherwise assist you.

Sincerely,



Jonathan Guzzo
Advocacy Director