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31 January 2007

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

RE: Environmental Assessment to Restore Interim Access to Queets Road (ID: 17635)

Dear Superintendent Laitner:

American Whitewater appreciates the opportunity to comment on the Environmental Assessment to Restore Interim Access to the Queets Road. We support the preferred alternative to utilize U.S. Forest Service Roads 21 and 2180 as access to the Queets River including facilities at the campground and trailhead. This alternative provides the unique opportunity to provide more dependable year-around access while increasing protection of aquatic and riparian resources. Through the preferred alternative these goals can likely be achieved while reducing annual maintenance costs.

Interest of American Whitewater

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 6,500 members and 100 local-based affiliate clubs, representing approximately 80,000 whitewater paddlers across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. Founding principles of our organization include protection of the wilderness character of waterways and promotion of the recreational value of wilderness rivers.

As a conservation-oriented paddling organization, American Whitewater has an interest in the rivers of the Olympic Peninsula including the Queets River and its tributaries. A significant percentage of American Whitewater members reside in the Pacific Northwest and regularly take advantage of the opportunities for wilderness exploration that the Park offers. Paddlers are known to explore the upper reaches of the Queets River and major tributaries that include Tshletshy Creek, Sam's River, and Matheny Creek.¹ While the recreational opportunities are important we place a high value on protecting naturally functioning river ecosystems, including their fish and wildlife, geomorphic processes, and incredible riparian forests where natural successional processes dominate producing a rich mosaic of vegetation patches. The Olympic Peninsula has been referred to as an

¹ Descriptions and photos of these rivers can be found on our website at <http://www.americanwhitewater.org> and in the guidebook: Korb, G. 1997. A Paddler's Guide to the Olympic Peninsula.

“Island of Rivers,”² and the recently released Draft General Management Plan refers to water as a “unifying theme” of the Park.³ The river systems are thus defining landscape features of the Park that are highly valued by our membership and the general public.

The Queets River is particularly important to our membership for its status as one of the most intact river systems in the conterminous United States. Research from this river has advanced our understanding of river processes and informed river conservation efforts throughout the region.⁴ One of the remarkable and distinctive features of the river is the intact and dynamic floodplain where river processes can be freely observed. Continued actions to maintain the Queets Road in its current configuration disrupts these natural processes.

Comments on the Preferred Alternative

Olympic National Park, like all our Parks, faces a sometimes challenging mandate of providing opportunities for the public to enjoy the resource while conserving park resources and values. The National Park Service is directed to “provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the superlative natural and cultural resources found in the parks.”⁵ At the same time the National Park System established by the Organic Act and reaffirmed by the General Authorities Act, directs park managers to seek ways to avoid, or minimize to the greatest degree practicable, adversely impacting park resources and values.

Rivers like the Queets are clearly a superlative natural feature of Olympic National Park, which is unique for the diversity of wilderness river opportunities in the conterminous United States. For comparable opportunities one has to travel to Alaska or Canada, and with rainfall totals of more than 15 feet per year, the Queets provides a unique opportunity to enjoy and experience a large floodplain river largely protected within the boundaries of the Park. The road along the Queets River and the undersized bridge across Matheny Creek have continued to have ongoing negative impacts on park resources and values. The road is constructed across several glacial outwash terraces that are being actively eroded by the river including the site of the landslide that led to the current road closure. The sediments in the area of the landslide are dominated by deposits from the Hoh Oxbow 1 advance (ca. 42,000-35,000).⁶ These glacial outwash terraces are critical to

² Beres, N., M. Chandler, and R. Dalton. 1988. *Island of Rivers*. Pacific Northwest National Parks and Forests Association. Seattle.

³ Olympic National Park, Draft General Management Plan, May 2006, at page 100.

⁴ Two river ecology textbooks are largely based on research conducted along the Queets River: Naiman, R.J. and R.E. Bilby. 2001. *River Ecology and Management: Lessons from the Pacific Coastal Ecoregion*. Springer Verlag; Naiman, R.J. H. Decamps, and M.E. McClain. 2005. *Riparia: Ecology, Conservation, and Management of Streamside Communities*, Academic Press. Research activities were also recently profiled in a story in the Seattle Times: Mapes, Lynda V. A river reigns through it. *Seattle Times Magazine*. January 30th, 2005.

⁵ 2006 NPS Management Policies at page 157.

⁶ See Thackray, G.D. 2001. Extensive Early and Middle Wisconsin glaciation on the Western Olympic Peninsula, Washington, and the variability of Pacific moisture delivery to the Northwestern United States. *Quaternary Research* 55:257-270; Thackray, G.D. 1996. Glaciation and neotectonic deformation of the western Olympic Peninsula, Washington. PhD dissertation, University of Washington.

river function serving as important sources of spawning gravel and large wood debris. There are very few rivers in the entire region where these processes are allowed to freely operate.

The elegant solution proposed in the preferred alternative affords a unique opportunity to largely eliminate these impacts while continuing to provide opportunities for public enjoyment of the resource. In our comments of 29 September 2006 on the Olympic Draft General Management Plan, we noted our specific interest in the Queets River corridor and provided recommendations consistent with this Environmental Assessment as follows:

Currently there are parallel road networks within the Park and on National Forest lands. The Queets Road within the Park follows the river through the channel migration zone and across terraces composed of fine-grained sediments that are slumping into the channel. At the Matheny Creek river crossing the bridge is undersized and fill is replaced on a regular basis in an attempt to preserve this crossing. In contrast the Forest Road 21 and 2180 spur are paved, cross Matheny Creek along a section of the river that is bedrock controlled rather than alluvial, are well outside sensitive riparian areas, and pass within a mile of the Queets Road where a gated connector road could provide a potential alternative route into the Queets Campground and boat launch. The Park should seriously explore an alternative of decommissioning the Queets Road upstream of Hartzell boat launch and providing alternate access to the campground and boat launch through a partnership with the Forest Service utilizing Forest Road 21 and 2180.

We fully support the proposed action and appreciate the initiative the Park staff took in fully exploring this alternative in partnership with adjacent public land managers. While the Environmental Assessment presents the Proposed Alternative as interim access, we propose that this alternative route be designated as the new permanent access to the Queets River Campground and Trailhead. Given the significant and comprehensive investment in analyzing this alternative and the fact that it will likely reduce long-term maintenance costs, we believe the Park should seriously consider retiring the Queets Road. This should include removal of the undersized bridge at Matheny Creek that requires constant maintenance. These ongoing maintenance activities have not received adequate environmental review and it is obvious that the channel migration zone is significantly wider than the bridge crossing. The road has been closed several times and for extended periods of time due to the ongoing issues at this site. With access provided at Hartzell Creek Boat Launch and the Queets Campground river runners would have an opportunity to enjoy a river trip that does not parallel a road, the only location in the Park where this would be possible.

One downside of the proposed action for recreational users is that it will extend the time required for a shuttle for those who enjoy float trips on the Queets River. The benefit will be more dependable access which is not currently available when critical sections wash out and are not repaired for many months. In addition, kayakers who enjoy the opportunities on Sam's River will now have a much shorter shuttle.

One additional comment is that the Environmental Assessment notes that one gate will be installed on the 2180-010 to restrict public access if necessary for weather related or seasonal closures. It would be installed prior to the bridge crossing across Phelan Creek..⁷ We are concerned with any plans for seasonal closures. As the Environmental Assessment notes recreational use of this river during the winter season is high and we are not clear why seasonal access would be considered. Given the opportunities on this river for river runners and fishermen during the winter season we do not support a seasonal closure for this river.

Conclusion

American Whitewater fully supports the Preferred Alternative that will provide more dependable access not subject to frequent road washouts, increase protection of aquatic and riparian resources for one of the Park's signature rivers, and reduce overall annual maintenance costs for redundant road systems on public lands. River runners will have a new opportunity to conveniently experience a river that is not paralleled by a road, making it the only major river system in the park where this will be possible, and a more convenient route for those running Sam's River will become available. The Proposed Alternative will thus provide a net benefit for recreational users and protection of park resources and we encourage the Park to more aggressively pursue this approach on other river systems throughout the Park. We appreciate the hard work of Park Staff and partner agencies who worked together on this project.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. O'Keefe', with a stylized flourish at the end.

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director

⁷ Environmental Assessment to Restore Interim Access to Queets Road at page 27