Yewah Lau, District Ranger
c/o Kim Crider
Olympic National Forest
1835 Black Lake Blvd SW
Olympia, WA 98512

October 26, 2018

Re: Wynoochee Restoration and Roads Management Project - Scoping

Dear District Ranger Lau,

WildEarth Guardians respectfully submits these comments to the U.S. Forest Service in response to the agency's scoping notice for the proposed Wynoochee Restoration and Roads Management Project. The scoping notice states that the project purpose is: "to restore terrestrial, riparian and aquatic habitat toward desired long-term conditions " (Department of Agriculture, Forest Service, Olympic National Forest, Wynoochee Restoration and Roads Management Project, Scoping Notice, p.1 September 2018). The project is located in the Wynoochee watershed on the southern section of the Olympic National Forest. Please add our name and organization to the contact list to receive any future public notices regarding this project and please use standard mail (not certified) if sending items via the Postal Service.

We are encouraged to see the Olympic National Forest state that one of the purposes of the project is to "identify a road system that meets transportation needs while reducing aquatic risk associated with specific roads" (Scoping notice, p. 2). We are pleased to see some activities identified that could move the forest further towards achieving that objective namely:

- decommissioning 52 miles of road that are now currently closed plus another 15 miles that are currently rated for high clearance vehicles
- storing 45 miles of road that are currently rated for high clearance vehicles
- additional activities to reduce risk to water quality and aquatic organisms including fish passage, instream wood placement and floodplain rehabilitation.

Additional project activities listed in the NOI include:

- commercial thinning of about 5,044 acres
- temporary road construction (12 miles; 5 miles new, 7 miles reconstructed)
- road to trail conversion (1.7 miles) and parking
- diseased tree removal at Coho Campground
- wildlife restoration enhancements

We know others have expertise in the proposed logging components of this project so we are particularly interested in the components that address water quality, aquatic habitat, improve watersheds and ensures forest resiliency in a changing climate. An overly large, costly and deteriorating road system is a key contributing factor to many of these problems. We also know that many people, like us and our members, use roads to access recreational areas. Reducing the road system, reducing impacts from the road system and retaining access are not mutually exclusive goals. We believe it is possible to improve watershed conditions while also improving access, but it takes thoughtful planning, clear communication and true commitment to achieve these results on the ground.

As you embark on the next step – preparing a detailed draft Environmental Assessment– we wish to call attention to a few items that we expect to see in the analysis.

1. **As part of the analysis of the Wynoochee Restoration and Roads Management Project, the Olympic National Forest must continue to consider the Travel Analysis Report and identify the Minimum Road System.**

We are encouraged to see the Olympic National Forest express a desire to sustainably manage the road network in the project area (and across the forest). An excessively large road-system is a financial liability for an agency that continues to see its budget reduced by Congress. This is why it's important to focus limited maintenance dollars towards roads that people use for recreational access and decommission roads that are no longer needed and causing harm to natural resources. We urge the project team to consider what is really needed as the minimum road system 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." 36 C.F.R. §212.5(b)(1).

With a project-level analysis leading to the identification of the minimum road system, the Olympic National Forest would move forward in their efforts to comply with the Roads Rule. The Roads Rule created two important obligations for the agency. One obligation is to complete a Travel Analysis Report and identify unneeded roads to prioritize for decommissioning or to be considered for other uses. 36 C.F.R. § 212.5(b)(2). The Olympic National Forest completed this obligation in 2015 with their Travel Analysis Report. Another obligation is to identify the minimum road system needed for safe and efficient travel and for the protection, management, and use of National Forest system lands. *Id.* § 212.5(b)(1). This project could fulfill this second obligation for this project area and build off the recommendations of the Olympic's Travel Analysis Report. This would be consistent with

directive memoranda from the Forest Service's Washington Office[1] and Region 6 guidance directing forests to identify the minimum road system for precisely this type of project.[2]

We expect that the project team will use the Travel Analysis Report along with updated location-specific information to identify the minimum road system and outline implementation actions to achieve these obligations.

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 (Olympic National Forest Travel Analysis Report, July 2015). 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.

When projects are pursued in the forest, it is imperative that a range of options be analyzed to address the overwhelming costs of an aging road system.

The impacts from roads to water, fish, wildlife, and ecosystems are well documented in scientific literature. The following is just a small list of examples:

- Increased sedimentation in stream beds has been linked to decreased fry emergence, decreased juvenile densities, loss of winter carrying capacity, and increased predation of fishes, and reductions in macro-invertebrate populations that are a food source to many fish species (Rhodes et al. 1994, Joslin and Youmans 1999, Gucinski et al. 2000, Endicott 2008).
- Roads can act as barriers to [fish] migration (Gucinski et al. 2000). Culverts in particular often interfere with sediment transport and channel processes such that the road/stream crossing becomes a barrier for fish and aquatic species movement up and down stream.
- Where both stream and road densities are high, the incidence of connections between roads and streams can also be expected to be high, resulting in more common and pronounced effects of roads on streams (Gucinski et al. 2000).
- Roads and trails impact wildlife through a number of mechanisms including: direct mortality (poaching, hunting/trapping) changes in movement and habitat use patterns (disturbance/avoidance), as well as indirect impacts including alteration of the adjacent habitat and interference with predatory/prey relationships (Wisdom et al. 2000, Trombulak and Frissell 2000).
- Forman and Hersperger (1996) found that in order to maintain a naturally functioning landscape with sustained populations of large mammals (such as elk), road density must be below 0.6 km/km^2 (1.0 mi/mi^2).

[1] *See, e.g.*, Memorandum from Leslie Weldon to Regional Foresters *et al.* on Travel Management, Implementation of 36 CFR, Part 212, Subpart A (Mar. 29, 2012) ("The next step in identification of the [minimum road system] is to use the travel analysis report to develop proposed actions *to identify* the [minimum road system].")
[2] Pacific Northwest Region Memorandum, *Monitoring Travel Management NEPA Decisions for the Minimum Road System* (Sept. 6, 2016).

In order to eliminate or reduce the impacts to fish and wildlife, the Forest Service needs to take adequate steps related to its road system that truly do result in a measurable change. The scoping notice mentioned monitoring. Given the aquatics goals with this project, we would expect to see monitoring actions outlined in the environmental assessment that would provide information on whether or not the objectives are being met.

Based on current natural resource conditions, assessed risks from the existing road network, road densities across the landscape, the agency's limited resources, and long-term funding expectations, a sustainable road system is warranted. The Forest Service should prioritize road decommissioning to enhance landscape and waterways connectivity and ecological integrity based on benefit to species and habitats, addressing impaired or at-risk watersheds, and achieving road density standards.

We understand that there is not much information available at the "scoping" stage, but at the assessment stage, we will expect to see much more detailed information on how particular actions will meet the stated purpose of the project. What is the current condition of the watershed, aquatic health, terrestrial health and what will be the future condition, based on the proposed actions? What additional actions should be taken, if the project goals are not being met?

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. For example, in the Skokomish watershed (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 problems[3]

Other studies also show significant improvements with road decommissioning:

- **hydrologic recovery is speedier.** Lloyd et. al. (2013)[4] 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)[5] also discovered that there is less erosion/runoff on treated roads.
- **reduced sediment delivery to streams.** Nelson et. al. (2012)[6] compared sediment delivery rates on decommissioned roads and stormproofed roads. After storms, the decommissioned roads had 80% less sediment delivery while stormproofed roads had

[3] 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.
[4] 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.
[5] 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.
[6] 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.

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)[7] 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, the stated purpose of this project and the economic liability of an overly large road system, we ask that the project team take considerable time to determine which road actions proposed result in the greatest benefits.

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

The Wynoochee watershed includes popular hiking, camping, swimming, boating, horseback riding, hunting, and fishing opportunities. A number of roads provide key access opportunities to trailheads and campgrounds. These important roads should be scored high as to their benefits in a sustainable roads system and given significant consideration for retention and dedicated maintenance.

We know about the significantly higher costs associated with roads maintained for passenger vehicles (maintenance level 3+ status) and can understand the need to reduce costs by reducing maintenance level. However, this can also have detrimental impacts. Less maintenance can leave a road more vulnerable to storm damage, washouts and loss of access. Federal Highways emergency relief dollars are generally not available for roads with a lower maintenance level. Many people do not own high clearance vehicles and have difficulty accessing recreational sites when roads are not well-maintained. In particular, we ask you to take a second-look at the <u>key</u> access roads and the costs/benefits of what you are proposing.

Although we are pleased to see road to trail conversions as part of the activities proposed with this project, we would like to have more information related to the need for the conversion that accesses the Wynoochee pass trail. What will be accomplished with the conversion? Are there other ways to achieve the same outcome? And why does parking only accommodate 3 vehicles? We can assume there are significant reasons but we would like to have that further explained. Likewise, we would like to see if there are other options for road-trail conversions that can add to the recreational experience in this watershed. It is our understanding that there is a lack of trails, in comparison to other areas of the forest. Though the Forest Service may not have the funds now to develop a new trail, it would certainly be beneficial to assess the feasibility through this project should funds become available in the future (or if partners can find funds). The Upper Wynoochee Watershed Analysis suggested the same: "Work with other resource disciplines in developing an access and travel management plan where roads can be converted to trails. Look for opportunities to utilize railroad grades as interpretive

[7] 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.

trails" (Upper Wynoochee Watershed Analysis September 1996, Page 2.1-15). We understand the costs associated with these actions, 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.

3. **We expect the draft Environmental Assessment will describe how aquatic risks will be reduced with proposed actions associated with the project.**

The 2015 Travel Analysis Report analyzed risks to local fisheries and area hydrology from the road system across the entire forest – referred to as "high risk" roads. If these "high risk" roads have "low benefit" (i.e. no need for public access and forest management), then they should be decommissioned. If these "high risk" roads have "high benefit", then they should be prioritized for strong maintenance, stormproofing, BMP installations, and/or mitigation. Measures need to be taken that ensure the risks to aquatics is eliminated or significantly reduced. "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 roads[8]. 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. A vast majority of the roads in this watershed and across this national forest are impacting water quality. This is the time to understand those risks and outline specific measures to reduce them. In particular, since this is a Tier 1 watershed with salmon and bull trout, it is especially important to clearly identify how the risks will be reduced. We will look to see how the entire suite of proposed road activities (decommissioning, storage, culvert replacement and road maintenance) will reduce the specific aquatic risks identified in your Travel Analysis Report.

The Olympic National Forest staff should consider using the GRAIP-lite tools developed by the Rocky Mountain Research Station as a way to compare different road activities for the alternatives analyzed. This tool has some limitations, but can provide additional information to understand where more intensive treatments (including BMPs) might yield greater benefits to aquatics (in terms of sediment inputs). It can also be used as an effective way to communicate with stakeholders why some roads may have little impact and some have much greater impact.

4. **The Forest should not construct temporary roads. If avoidance is impossible, a minimal amount of roads should be used and the roads should be immediately reclaimed after use.**

We encourage the Forest to take a hard look at the proposed temporary roads (12 miles) in order to be certain that they are needed. Though we understand that USFS policy states that

[8] 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.

road beds be restored to natural condition after the project, there is still an impact when temporary roads are developed. In addition to their hydrologic impact, roads fragment habitat, disturb wildife, support more noxious weeds and increase fire danger. Additionally, if they are not properly rehabilitated post-project, they can invite illegal incursions and more damage to natural resources. If avoidance is impossible, then we expect to see how the Forest will ensure that these segments are restored as soon as the project activities are completed. In addition, we ask that the segments are monitored and enforcement actions taken to ensure proper closure.

5. **The Olympic National Forest should take this opportunity to do a robust analysis, use best available science, and fully address the issues in this area.**

The Forest Service has limited capacity to complete an Environmental Assessment multiple times in a watershed, thus we ask that the agency really take a hard look at current conditions, identify future desired conditions, and identify a suite of road-related actions that truly will achieve those goals. Several different alternatives could be developed – including a watershed health alternative – that takes advantage of this process to understand and address the needs in this area. Using best available science and considering future changes (such as those being experienced with climate change scenarios impacting hydrologic regimes) can help the forest achieve its goals.

Lastly, we also offer the following suggestions:

- Avoid harvesting in riparian reserves where soils would be disturbed - increasing the likelihood of sediment inputs to streams. Erosion, compaction, and other alterations in forest geomorphology and hydrology associated with activities in riparian reserves seriously impair water quality.
- Avoid harvesting near trails. If that cannot be avoided, then schedule harvesting outside of high recreational use times.
- Avoid constructing or reconstructing temporary roads, which can serve as conduits for sediment transport until they are decommissioned, which can sometimes be years later.
- Clearly explain road terminology and the activities associated with those terms. What is the objective of the various road activities? Do road maintenance activities minimize adverse environmental impacts? How many of the roads are currently not driveable due to washouts? What are the pro's/con's of changing road maintenance levels?
- Use GRAIP-lite to determine which road segments are the greatest contributors of sediment to streams. With the roads that are essential and must be kept on the system, specific Best Management Practices can then be implemented with the goal of protecting water quality and aquatic species and also reduce sediment loads to the streams. Roads that are not needed should be decommissioned in a manner that improves watershed condition. Are the aquatic risks identified with these project roads in the Travel Analysis Report addressed with these road-related actions? If so, how?
- Identify problem culverts that either serve as impediments to aquatic organism passage or may fail during winter storms. Reducing risk of culvert failure also reduces risk of excess sediment inputs and retains access. It would be helpful to know if culvert replacements being considered are for driveability, stormproofing or for improvements to aquatic systems.

- Explain why commercial logging is being proposed but not stewardship thinning. Stewardship projects can provide retained receipts that can then be used for projects within the watershed including recreational infrastructure and road maintenance.
- Consider a full-suite of economic measures that could meet the project purpose of "contributing to the economic vitality of local communities". Road activities, watershed restoration activities, recreation activities – all have economic contributions because they all require people to implement these activities. These should be considered and measured.
- Identify the minimum road system for this project area.
- Identify the net improvement on the ground that really meets the project purpose of identifying "…a road system that meets transportation needs while reducing aquatic risk…."

Conclusion

As conservationists and visitors to the Olympic National Forest, we use the roads and trails but also recognize the harm that aging and unmaintained roads cause. The Forest Service's current road system is oversized for current uses, unaffordable with current budgets and causing significant harm to wildlife and aquatic species. In addition, unmaintained roads are impacting access when storms destroy roads. A road system that it too large for current budgets can lead to unplanned road closures, often to key recreational destinations, because of lack of road maintenance.

We are pleased to see that the Olympic National Forest is focusing on the Wynoochee and identified the need to have a balanced road network that is causing less harm as one of the key purposes of this project. This is incredibly important and long overdue. We are certain that when staff take a hard look at the road system and integrate thoughtful planning and clear communication, the Olympic National Forest staff can identify a minimum road system that is balanced. This endeavor to identify and manage a sustainable road network is one of the most important efforts the Forest Service can undertake to restore aquatic systems and wildlife habitat, facilitate adaptation to climate change, ensure reliable recreational and community access, and lower operating expenses. The actions proposed and decided upon will chart the direction of this watershed for several decades thus we strongly encourage you to do this well.

If you have questions, please contact me.
Sincerely,

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