April 15, 2020

Yewah Lau

Hood Canal Ranger District

Olympic National Forest

1835 Black Lake Blvd. SW

Olympia, WA 98512

c/o Kim Crider

In Reply to: Wynoochee Restoration and Road Management Project

Dear Ms. Lau,

I would like to thank you for the opportunity to comment on the Wynoochee Restoration and Road Management Project. I understand the complications and challenges with trying to manage a landscape such as this, as well as the difficulties involved with the process and documents needed to have a plan approved. I would also like to thank you for finally putting a plan together that will help enhance our neglected and unhealthy forests.

After these areas were logged, they were replanted with the assumption that they would be actively managed (thinned) to produce another crop of harvestable timber. With the lack of active management that has happened over the life of these trees, they have become over crowded, stressed and unhealthy. I have spent my life exploring areas around Wynoochee lake and areas with a lot of dead and dying trees are very noticeable. Letting this forest grow in an unhealthy state will slow its growth, leading to lower levels of carbon sequestration and at the same time, leaving it more susceptible to fire and insect infestations. This is why active management is necessary weather the forest is managed for timber products or future old growth habitat. What this plan includes is a very good start to managing this forest back a healthy state but it should not end there. There should be plans to come back in the future to manage other areas that are not included in this project. These areas include younger timber not yet financially viable or not yet to a state of unhealthiness. Other areas could include future treatments of previously thinned stands to create small clear cuts with snag creation to simulate pockets of wind damage, or larger areas to simulate a fire. Both areas left with a lot of large downed woody debris to produce areas with different levels of habitat structure, further resembling and fast-tracking old growth like habitat.

In order to continually manage the forest to the desired result, the road infrastructure will need to be maintained. This is why the abandonment and closure of roads is not a good decision for any type of long-term management goals. Even though many roads are currently not passable, they are there, in place and other than roads with large failures are cheap and easy to reconstruct compared to new construction. Many of these roads do have the potential to produce sediment into streams but due to the fact that many of them have been weathering for 50 years, the chance of failures happening is very low. The biggest risk to the existing roads is a culvert blockage diverting water to where it can cause erosion. This can be reduced by light maintenance of cleaning culvert inlets at regular intervals (its cheaper to clean the inlet than it is to remove it). The best thing to do to keep roads in drivable condition, reduce erosion and minimize sediment delivery is to keep them open and maintained. The public generally will remove fallen trees, limbs and rocks as they drive around recreating on these roads, this can be seen as a free service as repayment for leaving these roads open. As vehicles drive along these roads, they keep the vegetation from growing on the running surface, keeping it compacted. A compacted road surface turns to an impermeable surface which can carry more sediment but it also doesn’t erode nearly as much as a surface that is not compacted. By keeping these roads open, it reduces the cost of reconstruction the next time they are needed.

Many of the cross drains in these road systems are 18” metal pipes. An 18” pipe (depending on the slope) will flow generally in the range of 20-50 ft^3 / s (150-375 gal/s), this is far more than the 100-year flood event for the majority of cross drains. Larger stream crossings would need to be assessed individually to determine if they would pass a 100-year flood event, not just assumed that “are not designed to withstand a 100-year flood event”. Stream crossings that are in need of attention are the ones that are blocking fish passage. There are some crossings in need of replacement or even just removal (not worth replacing them for the minimal area behind), examples are the crossings marked along Harris Creek. The structure underneath the 22 road at Harris Creek does not pass fish, though it most likely will pass a 100-year flood event. This also goes for the crossings upstream from the 22 road. There are many fish blocking structures that are overlooked in this project. According to the DNR’s Forest Practices Application Mapping Tool there are multiple crossings of “fish bearing” streams that cross roads and are not fish passable, example, the 2270 road has approximately 12 structures that are blocking fish passage. Why are these not included in the project?

The project plan it to open these roads up, thin the timber in some places, then decommission the roads. Some roads are will need to be opened up and roughly fixed just to go in and decommission them without harvesting the timber. It may have not been looked at in the field yet, but the 2275 road has a slide to cross around Eleanor Creek. This will be a massive project just to decommission the road behind it. The expense of this one project could possibly fund the road maintenance (brushing, pipe cleaning, grading) on every road in this project plan.

Like was stated above, the scope of this project is a very good start to the rehabilitation of the forest in this area, but it should not end there. There are many more projects that need to be addressed, so decommissioning and closing these roads will only increase their costs and reduce recreation opportunities. The many fish blocking structures that need to be replaced can be funded by timber sales. Timber sales like the ones proposed in this project that are for habitat improvement. These projects can be set up like the Humptulips Thinning Project on the 2204 road, where timber sale revenue is used to replace a fish blocking culvert. Projects like these can also be used to fund road maintenance projects such as brushing, grading, and culvert cleaning.

I would rather see our money go to road maintenance than to road closures, and keep the option open to further manage the forest.

Thank you for your time,

Nolan Rabey