November 9, 2020

Submitted electronically at:
https://cara.ecosystemmanagement.org/Public//CommentInput?Project=53124

Reviewing Officer: Forest Supervisor Kelly Lawrence
Olympic National Forest
1835 Black Lake Blvd. SW
Olympia, WA 98512

Re: OBJECTION – Wynoochee Restoration and Road Management Project

To Forest Supervisor Lawrence,

The undersigned organization received notice of the U.S. Forest Service's draft decision to select Alternative B (with modifications) from the alternatives analyzed in the Wynoochee Restoration and Road Management Project Environmental Assessment (EA). We submit our objection to that draft decision.

As required by 36 C.F.R. § 218.8(d), the lead objector's name, address, and telephone number:

1. Identification of Objectors

The lead objector's name, address, and telephone number:

Marlies Wierenga, Pacific Northwest Conservation Manager
WildEarth Guardians
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Seattle, WA 98125
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mwierenga@wildearthguardians.org

WildEarth Guardians is a nonprofit conservation organization with offices in Oregon, Washington and five other states. WildEarth Guardians has more than 180,000 members and supporters across the United States and the world. Guardians works to protect and

restore wildlife, wild places, wild rivers, and the health of the American West. WildEarth Guardians has organizational interests in the proper and lawful management of the forest road system and its associated impacts on the Olympic National Forest's wildlife and wild places.

2. **Previous Involvement in the Wynoochee Restoration and Road Management Project**

Our organization submitted scoping comments on October 26, 2018 and comments on the Draft Environmental Assessment (EA) on April 13, 2020. Our organization has a strong interest in both prioritizing the maintenance of key recreational access routes while also identifying roads for decommissioning not necessary for access that pose aquatic and terrestrial resource risks to the watershed. Our members, supporters and staff enjoy the many benefits that Olympic National Forest provides.

3. **We support the Forest Service's efforts to create a resilient future road network.**

We support ecosystem restoration and applaud the Forest Service's efforts to address key factors that continue to degrade the project area. Specifically here, evaluating 222 miles of roads and decommissioning 63.6 miles of forest road, treating another 77.5 miles of forest road for aquatic risk before being stored, converting 3.5 miles to trail, while also focusing the limited road maintenance budget on the remaining 70.3 miles. It is clear from all project documents that most of the roads proposed for decommissioning are unsafe, or undrivable (grown in with vegetation) or inaccessible and most (over 50 miles) are already closed to motorized use. The draft decision simply allows the Forest Service to further "treat" the roadbeds and remove culverts to reduce the harm that the current relics pose.

Identifying a resilient future 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, ensure reliable recreational access, and operate within budgetary constraints. We are pleased that the Olympic National Forest is moving forward with identifying the minimum road system for this area. Strategically addressing the road system is a win-win-win approach: (1) it's a win for the Forest Service's budget, closing the gap between overwhelming maintenance needs and drastically declining funding due to lack of appropriations from Congress; (2) it's a win for wildlife and salmon because it reduces negative impacts from the forest road system; and (3) it's a win for the public because removing the burden and liability associated with unneeded roads allows the agency to focus its limited dollars and staff time on the roads we all use, *improving* public access across the forest. With the rains and storms that pummel the Olympic Peninsula, the Forest Service needs to ensure key roads are properly maintained to withstand strong storms, so forest users don't lose the ability to access the forest.

We strongly support the agency's thoughtful, strategic approach to improving public access to the forest, reducing negative impacts from forest roads to water quality and aquatic habitats, and improving watersheds and forest resiliency.

4. **Objection and suggested remedy.**

a. The Final EA fails to ensure that aquatic factors are fully addressed.

The Final EA states that the need for the project is "…to improve the Wynoochee River watershed through old growth forest development, road management, recreational site adjustments, and restoration of riparian and aquatic resources." The Forest Service's regulations state that an EA must include a proposed action and alternatives, and "briefly describe the proposed action and alternative(s) *that meet the need for the action*." 36 C.F.R. § 220.7(b)(2) (emphasis added). Here, the Forest Service violates its regulations by failing to meet the full needs for the action, specifically related to aquatic resources.

In the response to comments, the agency stated that they are attempting to "strike a balance between providing road access and protecting aquatic and terrestrial resources". Most of the roads, however, that are being decommissioned are already not open to motorized use and/or overgrown with vegetation and/or a severe safety hazard. Even the roads that are "open" and will be "stored" are identified to mostly be undriveable. It is unclear where road access is lost when a road is already closed or not driveable.

The project area includes the headwaters of the Wynoochee River, Upper Wynoochee River and Upper West Fork Satsop River. All the subwatersheds here are currently rated as "functioning at risk", primarily due to roads, according to the Watershed Condition Framwework. However, the road densities in the subwatersheds after all project activities are implemented still leave the watersheds categorized as "functioning at risk". For example the Headwaters Wynoochee subwatershed currently has a road density of 2.7 miles/square mile ("not functioning") and post project it would be 1.6 miles/square mile ("functioning at risk"). A properly functioning watershed, and one that is essential for aquatic health, should only have 1 mile of road per square mile. Reducing aquatic risks does move towards better conditions but to truly improve these watersheds, waterways, and habitat for bull trout and salmon, more needs to be done.

As we stated in our comments, these watersheds are the starting point for clean, cold water and important habitat that is a critical component to the salmon recovery work being implemented throughout the basin. The Wynoochee watershed supports coho, Chinook and chum salmon, bull trout, steelhead/rainbow trout and resident and sea run cutthroat trout. Bull trout are listed as "threatened" under the Endangered Species Act (ESA) and have foraging, migration and overwintering critical habitat on USFS lands on 5.6 miles along the Wynoochee River and 3.8 miles on USFS lands along the Satsop River. Numerous communities, tribes and NGO's are working hard throughout the drainages on the western side of the Olympic Peninsula to protect and restore aquatic habitats to ensure salmon/steelhead thrive and are not listed under the ESA. The actions proposed in this project contribute to that effort.

In the draft Decision Notice, the Forest Service notes that 50% of the roads in this area were identified as "likely not needed" in the 2015 Travel Analysis Report, yet that is not achieved with only 30% in this draft final decision. The Forest Service is choosing here to defer to a

later time actions that are really needed to improve watershed health. While "storing" a road can be helpful in reducing road maintenance costs, studies have shown that this isn't as effective as road decommissioning.

> Nelson et. al. (2012) compared sediment delivery rates on decommissioned roads and stormproofed roads. After storms, the decommissioned roads had 80% less sediment delivery while stormproofed roads had 67% less sediment delivery.[1]

Due to the length of time it takes to implement a project, there will not be another opportunity to address the remaining 20% of "likely not needed" roads in the next decade or two. This is why it's so important to do this right now.

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, additional road decommissioning is warranted. The Forest Service should meet the aquatics needs, enhance landscape connectivity and ecological integrity based on benefit to species and habitats, address impaired or at-risk watersheds fully, and achieve this by meeting science-based road density standards for aquatic species.

Suggestion: Consistent with the Olympic National Forest travel analysis report, Forest Service policy and guidance, and the Olympic Forest Plan, the Forest Service should modify its decision to include more road decommissioning to reduce road densities and thereby better protect ESA "threatened" species, aquatic habitat and water quality.

Conclusion

WildEarth Guardians appreciates your consideration of the information and concerns addressed in this objection. We recognize the contributions of staff in moving this project forward in an area that desperately needs attention. Pursuant to 36 C.F.R. § 218.11, we respectfully request to meet with the reviewing officer to discuss these concerns and suggested resolutions. Should you have any questions, please do not hesitate to contact us.

Sincerely,

Marlies Wierenga
Pacific Northwest Conservation Manager

[1] 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.