



Volunteers, educators and stewards for birds and habitat conservation

P.O Box 502 Sequim, WA 98382

March 13, 2019

Superintendent Sarah Creachbaum
Olympic National Park
600 E. Park Avenue
Port Angeles, WA 98362

Re: Olympic Hot Springs Road Long-Term Access/Environmental Assessment

The Olympic Peninsula Audubon Society (OPAS) appreciates the extended comment deadline for this project. We also appreciate the briefing by Kirk Loftsgaarden of FHWA and the opportunity to visit the project site with you and your staff on March 6. We found the insight of Scott Gremel particularly valuable when considering comments from an Audubon perspective.

Our takeaway from the briefing affirms that removing a portion of the road from the floodplain is part of the ongoing dam removal project that enables the return of the Elwha to become a meandering river. Because of the steep slope where the bridge has washed out there is no good solution to rerouting the Olympic Hot Springs Rd. It must remain accessible to motorized traffic due to the ONP General Management Plan.

The one-mile bypass road should be designed and constructed to minimize impacts to both the Elwha and its fisheries, but we express concern about the removal of many of the mature and old-growth trees that cover the reroute. Scott Gremel's survey in December 2018 identified 42 trees in the corridor that are large enough to provide potential nesting platforms for the WA state endangered Marbled Murrelet. We recommend that ONP undertake an on-site breeding season survey to determine the potential for Marbled Murrelet nesting. OPAS supports minimizing the loss in upland trees, but we recognize an opportunity for revegetation with native plants for a bird-friendly landscape in riparian habitat when the road is moved out of the floodplain.

We remain concerned with the instability of the clay soil that could erode into the Elwha and the scale of structures such as the retaining wall at Sanders Fork required to construct a bypass road. The relocated road should be no wider than 22 feet and should follow natural contours so that the designed speed would not exceed 30 mph.

Since the relocation of the road out of the floodplain and the repair, rehabilitation and reconstruction of the 8.5 miles of the Olympic Hot Springs Road are funded from different sources, the planning processes should be separated to review the level of rehabilitation necessary for the remainder of the road. We believe that the multi-year, \$300 million Elwha River restoration should not be adversely impacted by fast tracking a lesser project to relocate

the Olympic Hot Springs Road out of the floodplain. We support the OPA recommendation to include a comprehensive Environmental Impact Statement for the road relocation.

It was a pleasure to meet your dedicated professional staff who share our concerns for stewardship of bird and wildlife habitat in a special place that will be observed for generations as the prototype of river restoration. From the perspective of the birds and their habitat, we look forward to participating in the review of this project as the NEPA process continues.

Sincerely,

A handwritten signature in cursive script that reads "Robert Phreaner".

Robert Phreaner, President