

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 60

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Port Angeles, WA 98362
USA
E-mail:

Correspondence Information

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Correspondence Text

I would like to recommend that ONP adopt Alternative #4 suggested by Clallam County for the Spruce Railroad Trail, mainly for ADA accessibility. Because our park is so rugged, remote, and mainly inaccessible to people in a wheelchair, it is important to take advantage of available funding to make sure that this trail is useable for everyone. The Olympic Discovery Trail is a dream come true and an asset for all of us...please keep it this way by making the Spruce Railroad piece the width and grade needed for wheelchairs and for all who will possibly use it.

Thank you.

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Correspondence: 61

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Port Angeles, WA 98363
USA
E-mail:

Correspondence Information

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Topic Question 1:
No

Topic Question 2:
Yes

Topic Question 3:
None of the Alternatives Except # 4 will be adequate for the disabled, weak and elderly. In particular, the less steep trail grade of Alternative # 4 would be the only option that will work for this group of people. Please authorize pursuit and completion of Alternative # 4 for Improvements to the Spruce Railroad section of the Olympic Discovery Trail. Alternatives # 1, 2 and 3 should be disgarded. Thank you.

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Correspondence: 62

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Bothell, WA 98011
USA
E-mail:

Correspondence Information

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Topic Question 1:

The actions are clear -- but for Alts 2 and 3 they fail to meet the Goals set out for this much needed project. Anything less than an 8 ft paved path would not provide "safe" ped/bike access. Nor would the narrower widths safely accommodate users with disabilities in the presence of other trail users. Nor would the narrower width "minimize conflicts between recreational users." Nor would they "provide facilities to [safely and adequately] support visitor use."

Topic Question 2:

You have failed to assess the inadequacy of the trail widths proposed in Alt's 2 and 3. 5' gravel and 6' paved are much too narrow for a multi-use trail -- especially if you wish to make it accessible and doubly so if you want to add horses!

Topic Question 3:

Absolutely! Alts 2 & 3 do NOT comply with any recognized design standard or guideline for mixed-use trails -- which, under Scoping, was supposed to be a criteria. The AASHTO Guide for the Development of Bicycle Facilities is crystal clear -- the MINIMUM recommended trail width for a shared use path is 10 ft. This may be reduced to no less than 8 ft but ONLY if bike traffic is expected to be low EVEN AT PEAK TIMES and ped use is only going to be OCCASIONAL and maintenance activities would not cause edge damage. You can expect this trail to be popular and heavily used by both bikers and walkers (and perhaps equestrians). Maintenance vehicles will likely exceed 6 ft in wheel width and thus will cause the paved edges to breakdown.

Topic Question 4:

Yes, building the trail to fully comply with AASHTO -- that is 10 ft min paved width.

Topic Question 6:

No, you have not adequately analyzed the safety hazards presented by Alt 2-3. If you had, then at a minimum Alt 4 would clearly be your Preferred Alternative.

Topic Question 7:

I am a dedicated utilitarian cyclist who also enjoys self-supported bicycle touring. I would NOT ride this trail if I did not think it was safe -- and Alts 2 & 3 are not. So I might prefer to ride on US 101 along Crescent Lake.

I have bike toured the entire Pacific coast (Canada to the Mexican border), across the US from Baltimore to Bothell, and internationally in New Zealand and 4 times in Europe. I am a certified Effective Cycling (R) instructor. For 9 years I bike commuted 32 miles/day, year round. I currently cycle over 5000 miles a year for utilitarian and recreational purposes. Further, while a professor at the UW, I developed a course on Human Powered Transportation and did research on bike/ped facilities. This led to me being hired as an expert in nearly 25 cases involving bicycle crashes -- many where the facility was an issue. In my professional opinion your Preferred Alternative (#3) is grossly inadequate and fails to meet your stated goals as well as not in compliance with accepted standards for such mixed-use trails. I have seen many trails that have been poorly designed and where maintenance activities have destroyed the pavement edges. I appreciate and share the desire to build a trail with minimum impacts on the environment. However, the facility you build will be in use for dozens of years and should not be grossly inadequate from day 1. Let's do it right the first time.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 63

Author Information

Keep Private: No
Name: [REDACTED]
Organization: Peninsula Trails Coalition
Organization Type: I - Unaffiliated Individual
Address: Port Angeles, WA 98362
USA
E-mail:

Correspondence Information

Status: Reviewed Park Correspondence Log:
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Topic Question 1:

Unclear: the difference in environmental impact and user experience from rebuilding the log cribbing and dry laid stone in alternative # 3 vs not doing that in alternative #4.

It is unclear how the NPS preferred alternative more steadfastly preserves the resource. Within sections A, B, and C the clearing limits are the same for Alternative 4 and Alternative 3. 14?. Alt #4 seems to better represent the historic RR appearance with the 8' asphalt matching track width and gravel trail matching the brakemans trail.

Topic Question 3:

Elements of #3 that work better than elements in #4

No trailhead facility on US 101 at the top of Fairholm Hill. Use the pullout on the SolDuc road instead as presented in Alt. #3. Build a paved trail to the SRRT from the kiosk pullout. Develop the North Shore Road trailhead. If trail users need to be discouraged from crossing US 101 at the top of Fairholm Hill, placing a trailhead there is ludicrous. At that location, users arriving in a motor vehicle cross traffic lanes in one direction of their trip without the turn lane advantages of an intersection. Crossing the road there in a vehicle is more dangerous than crossing it as a pedestrian, bicyclist or equestrian because you can't hear the traffic coming around the blind corner. Left turns into and out of that pullout will end up being deadly. Accessible trail from the kiosk pullout to the SRRT will address the needs more safely. The pullout at the top of Fairholm Hill can only be safely used as it currently is, as a Transit pullout, since that vehicle continues in the same direction.

An adequate trailhead at the Lyre River side is imperative. As gas costs continue to increase and with a change of concessioner at Log Cabin, the east approach to the SRRT may be one of the highest day use areas in the park.

Elements of 4 that are more suitable than elements in 3

Trail section D needs to be ADA/ABA compliant. It is a waste of the project to have it inaccessible from the potentially highest use direction, on the east. That is the direction traffic from populated areas will come from. Handicapped users will be trying to access the trail from here no matter what the signs say. If an EIS has to be done to properly construct this segment, then do it. It makes no sense to back out on the associated responsibilities to have this project done right.

The paved surface needs to be 8', just like the new trails at Hurricane Ridge and for the same reasons. As they were constructed, trails Hurricane Ridge and Hurricane Hill exhibited the problem of having too narrow a surface for the intended users. The problem has been corrected in Big Meadow (with AASHTO guidelines exhibited). The lesson of ignoring established guidelines in shared use trails has a poignant local example: Sequim had the financial freedom to use their own design standards in shared use trail construction. Designs were chosen that exhibited decreased and variable widths to preserve vegetation, lack of separation from traffic lanes, improperly aligned intersections, excessive grades along adjacent roads. All had AASHTO guidelines that were ignored and over the years the deficiencies have become a continued source of improvisation for law enforcement, maintenance personnel and users. A similar mistake in the SRRT development would lead to an unnecessary waste of Federal money, staff time and possible added degradation of resource due to facility design flaws. I believe the NPS planning process has the expertise to do better than that.

Topic Question 6:

The "Park operations and safety" section ignored grade implications on section D of alt. #3. The speed of descending wheeled vehicles at the stated up to 18% grade will be incompatible with a shared use trail and certainly with 2 way traffic even on an 8' wide trail let alone 6' wide.

The bridge specs for both alt #3 and #4 say bridge deck is 8' maximum. (pgs. 70 & 89) Yet both plans include the "missing trestle" bridge with a 10' deck and alt #4 has a 10' wide bridge on section D.

The park has included no facilities for horse trailer parking. I think that is OK because the Littleton horse camp is a good place with great facilities for horsemen to base out of. Further large trailer access facilities are in the works on DNR land east of the project area which is appropriate.

The tables comparing excavation/fill/trees taken as presented in the county proposal, page 29 are inexplicably at odds with the presentation in the EA. (page 117)

In alternative # 3, is all long tunnel construction done from the west since the east approach has 18% grades? If so, the construction will have a bigger impact on the US101 and the Lake and would have a bigger carbon footprint due to increased fuel use. In alternative #3, will any of the tunnel fill be screened for base rock or surfacing as it will be in alternative #4? Again, using on site rock would decrease the carbon footprint of the construction.

Topic Question 7:

If Section D were made to contain <8% grades and the paved surface constructed to 8', there would finally be an alternative route around the Lake for cyclists. I would use it regularly and encourage others to do so also. Big western national parks no longer exist in a vast vacuum of human presence as they did at the time of their founding. This proposal gives ONP the opportunity to become a relevant part of today's Olympic Peninsula transportation system. There would be evidence that the park is concerned about access to the park via bicycle rather than just being accessible to people who have cars to drive in the park and drive to the trailheads.

I would have a place to share with family members and friends who use wheels instead of feet for mobility. I would look forward to sharing that facility with veterans returning from our current conflicts who are learning to use prosthetics or wheels as a result of service related injuries. Even though I can no longer physically get into the backcountry, I would use and appreciate this unique project area for the natural beauty and feeling of awe that the backcountry had always provided.

Why alternatives #3 and #4 need to be melded together: The SRRT project has the potential of leading the park service into serving and respecting a new face of America which includes active, older and differently-abled populations. The NPS planning process needs to recognize and enable, not ignore this change. The vision of preservation in an age of resource scarcity is untenable if the paying populace can't appreciate what is being preserved. Park Service mission and goals are designed to protect the park resources from the degradation of "progress" and "utilization". But as human perceptions and access realities change, park planning has to recognize how to keep parks relevant to the democracy's economic decisions. The Wilderness Act allowed us to make a very clear line in how public lands are utilized. Wilderness areas must be preserved, untrammelled. Non-wilderness areas, particularly in the National Parks, are very important to create an appreciation for that deeper and perhaps inaccessible wilderness into which most visitors may never go.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 64

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Pacific, WA 98047
USA
E-mail: [REDACTED]

Correspondence Information

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Topic Question 1:
No.

Topic Question 2:
Document fails to cite any engineering standards that would allow the extraordinarily narrow trail pavement proposed in several alternatives.

Topic Question 3:
AASHTO recognizes the minimum physical operating width of a bicycle as 40 inches.

If pavement width is less than 80 inches, the facility should reasonably be expected to generate routine head-on collisions between bicyclists, as well as overtaking accidents when faster recreational riders attempt to pass loaded touring bicycles.

Such collisions are often serious, sometimes fatal.

Any proposal with pavement less than 80 inches continuous width should address expedited emergency medical access for the injury accidents such a facility should reasonably be expected to generate.

Only the County alternative provides pavement of a width that does not increase the risk of bicycle collisions according to accepted design standards for bicycle facilities.

Topic Question 6:
No -- there is no evaluation of the impact of emergency medical evacuations for cyclists injured by substandard-

width pavement.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 65

Author Information

Keep Private: No
Name: [REDACTED]
Organization: Tacoma Wheelmen's Bicycle Club
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Tacoma, WA 98405
USA
E-mail: [REDACTED]

Correspondence Information

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Topic Question 1:
No

Topic Question 2:
No

Topic Question 3:
no

Topic Question 4:
I believe Alternative #4 is the best option for the type use this trail will get.
I have never bicycled this area because the current road is a dangerous option.
I am SO looking forward to this trail being completed so I can do a bicycle tour of this area that was limited do to the road along the lake. This trail is going to get lots of bicyclists many fully loaded with panniers and camping gear. A 8 foot trail is the best option. Yes, it may be a little more expensive going in but it will save money in the long run when you have to go replace anything narrower option.

Topic Question 7:
I will use this trail because it will open the park that has been limited for bicycles prior to the completion of this trail.

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Correspondence: 66

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Seattle, WA 98199
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
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Topic Question 1:
NO

Topic Question 2:
YES

Topic Question 3:
Any alternative that does not allow for full access, including wheelchair access, will limit use by certain populations, which is not in the stated goals of the National Park Service.

Please select the trail alternative that would allow full access by all populations. The funding is there.

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Correspondence: 67

Author Information

Keep Private: No
Name: [REDACTED]
Organization: Rails-to-Trails Conservancy
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
San Francisco, CA 94104
USA
E-mail: [REDACTED]

Correspondence Information

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Topic Question 1:
No.

Topic Question 2:

The chief concern is width.

The proposed Alternative 3 does not follow accepted guidelines for shared-use path development. Accepted guidelines for minimum width including the AASHTO Bikeway Design Guide and Washington State DOT Highway Design Manual Chapter 1515 recommend a 10 foot wide path, but allow for a reduction to 8 feet in certain cases. Given the remote location with low traffic volumes and impacts to environmental and historic resources, a design exception for an 8 foot wide paved path can be justified on the SRRT.

The Draft Final Accessibility Guidelines for Outdoor Developed Areas are inappropriate to use as standards for width of a shared-use path. While they provide minimum standards for cross slope and many other conditions, the Access Board clearly recognizes shared-use paths are subject to higher standards. The Access Board website currently states "The NPRM discussed shared-use paths that are developed for use by pedestrians and other groups such as bicyclists. Shared use paths are also called "hiker-biker trails." The NPRM indicated that the scoping and technical provisions for trails apply to shared-use paths. The Access Board has further considered this issue and plans to conduct a separate rulemaking in the future to address shared use paths because they are also used for transportation purposes and may be subject to higher design standards."

Topic Question 3:

A 6 foot wide paved path is insufficient for two way bicycle travel. Bicyclists have an essential operating space 3 feet wide, and require an additional 1 foot in each direction for a "comfort zone" allowing for passing oncoming cyclists. For this reason, an 8 foot wide paved path is the absolute minimum that should be considered for two way bicycle travel. One of the best considerations of operating space required for bicyclists is found in the Minnesota

DOT Bikeway Facility Design Manual - ?Under normal conditions, a moving bicyclist needs a horizontal corridor at least 0.9 m (3 ft) wide in order to maintain balance when riding at low speeds or against crosswinds. To ride comfortably and avoid fixed objects (sidewalks, shrubs, potholes, signs signals, etc.) and other users such as pedestrians or in-line skaters, a bicyclist needs at least an additional 0.3 m(1ft) of lateral clearance on each side, bringing the total operating width of a one-way corridor to 1.5 m (5 ft).? Please see the figure 3-3 at <http://www.dot.state.mn.us/bike/pdfs/manual/Chapter3.pdf> for an illustration.

Topic Question 4:

Expanding the paved surface to 8 feet is critical for user safety, and Alternative 3 could be modified to have an 8 foot wide paved trail. There should also be recovery area provided to the sides of the paved surface. I do not have personal knowledge of the site to know if it is infeasible to create an additional 1.5 feet of shoulder by using retaining walls along the lake side of the project. Alternately, mitigating measures such as signage warning trail users of the condition could be implemented. Again, this is a liability concern that should be fully explored and justified.

Topic Question 7:

Pursuing Alternative 3 and constructing a 6 foot wide paved path that is open to bicyclists will likely result in bicyclists using the facility and crashing. Since insufficient operating width would be provided, bicyclists are likely to clip each other in passing or overcorrect after a near miss and ride off the paved path and down the slope resulting in serious injuries. It is likely NPS could be liable in these crashes since the facility does not conform to accepted shared-use path standards and NPS is aware of the unsafe nature of a narrow path.

Thank you for the opportunity to submit comments on the Spruce Railroad Trail Expansion and Improvement Environmental Assessment (SRRT EA) project. Rails-to-Trails Conservancy has documented best practices for developing shared-use paths and provided assistance to trail building groups for over 25 years. This project is a critical component to the Olympic Discovery Trail that will extend for 126 miles across the peninsula and should conform to accepted standards to enable the success of the entire Olympic Discovery Trail as a transportation and recreation corridor.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 68

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Sequim, WA 98382
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
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Topic Question 1:
No

Topic Question 2:

The revised proposal by Clallam County dated 9/9/11 (and further revised after the 9/21/11 ONP public meeting and release of the SRRT EA) is not considered in the published EA. The county proposal addresses and resolves the two major, serious flaws in the EA, the first of which is failure to provide handicapped access to the entire trail, and the second is failure to pave a wide enough portion to comply with national safety standards for shared use trails. The NPS must honestly, without any ?not invented here? bias, consider the Clallam County proposal provisions which correct these flaws, and should incorporate necessary portions of those provisions into the NPS EA preferred alternative.

Topic Question 3:

Leaving a 4.5? portion of the 10.5? wide raised roadbed in gravel will quickly remove its relevance as a historical artifact. Stock, mountain bikers and hikers will quickly flatten the raised gravel edge. Without excessive and unrealistic maintenance the roadbed will be unrecognizable as a historical structure. If the former roadbed were paved to 9.5?, with gravel shoulders for stabilization, and the old adjoining 4? wide inspection path were restored as originally built, off pavement users would have much less impact on the original raised roadbed. This would maintain a historically accurate trail to match the historical railroad tunnels. A trail of this paved width, nearly meets the 10? width (reducible to only 8? for trails with limited use) required in federal DOT specifications for shared use trails.

Topic Question 4:

Yes. The revised proposal number 4 much better meets the Purpose and Need for this action. However, use of the

entire, previously cleared, historical Spruce Railroad clearway, along with paving of the raised railroad bed and providing handicapped access on the Lyre River end most closely meets all requirements in the Purpose and Need while limiting all action on NPS land to restoration of the historical Spruce Railroad artifact.

Topic Question 5:

Preservation of the SRRT as a historical artifact (legal mandate) - Leaving a 4.5' portion of the 10.5' wide raised roadbed in gravel will quickly remove its relevance as a historical artifact. Stock, mountain bikers and hikers will quickly flatten the raised gravel edge. Without excessive and unrealistic maintenance the roadbed will be unrecognizable as a historical structure. If the former roadbed were paved to 9.5', with gravel shoulders for stabilization, and the old adjoining 4' wide inspection path were restored as originally built, off pavement users would have less impact on the original raised roadbed. This would maintain a historically accurate trail to match the historical railroad tunnels. A trail of this paved width, nearly meets the minimum 10' width (reducible to only 8' for trails with limited use) required in federal DOT specifications.

Compliance with handicapped access requirements (legal mandate) - The lakeside sections of the old Spruce Railroad bed provide a unique opportunity for handicapped persons to experience the unique beauty of Lake Crescent without the noise and pollution of nearby motorized vehicles. The length and remoteness of the trail along this lake is probably unique in the National Park System for its ability to provide handicapped experience of pristine natural environment. The preferred alternative unnecessarily eliminates safe handicapped access to much of this unique asset.

Topic Question 6:

No. The rough, unsubstantiated analysis in the EA overstates the difference in impact between the preferred alternative and alternative 4.

However, the environmental analysis in the EA is a red herring. A previously cleared, generally 16' to 18' wide railroad way exists along most of the proposed route. The environment of this section of the Spruce Railroad Trail are not significantly different than that of the 6.4 mile section of this same trail that has already been completed and is widely praised by all user groups. The EA finds it necessary restrict the width of this section of the trail to limit removal of landslides and vegetation that have encroached on the original, historical Spruce Railroad clearway. This is a misapplication of the mandate to minimize environmental impact when maintaining and improving access within the National Park System.

With respect to education and historical preservation objectives, I disagree with not removing naturally occurring changes which are more recent than the historical structure that is being preserved. When consideration of safety for users is added to the educational and historical preservation purposes of the trail, I cannot understand how the honest application of 'Choosing by Advantages' by ONP staff resulted in a 6' wide paved path. Surely safety, in combination with historical preservation, overrides cost savings obtained through removing less vegetation and other material when the men and equipment are already doing the same thing in the same place to provide the narrower trail.

'Natural' environment is not a factor; this is overgrowth and landslides. Old growth and previously undisturbed features should not be impacted, except possibly on adjoining private land where necessary to provide handicapped access from the existing trailhead to the Spruce Railroad bed in the ONP.

It appears that the proposed trail width is restricted to minimize the impact to Lake Crescent in the few areas where cribbing or fill is necessary. These very limited areas could be narrower than the remainder of the trail since they were historically narrower than other sections. Trail signage and the limited length of these sections would provide safety. The remainder of the trail should be paved to the same width as the 6.4 mile adjoining section of the trail.

Topic Question 7:

I am not handicapped but my safety, and the safety of others, would be negatively affected by a paved path that is narrower than the minimum safe width required by numerous state and national safety standards. Safety and enjoyment by myself and other shared users are directly and negatively impacted by this proposal and the misplaced

priorities that led to the selection of the NPS preferred alternative.

Clallam County and the ONP have previously worked together to build trails which meet all of the constraints and directives applied and discussed in the EA. Speculation about the obvious change in attitude by current ONP leadership as compared to the cooperation with Clallam County that led to the already completed 6.4 mile section of the Spruce Railroad Trail is unproductive. However, the result is a glaring black eye for the NPS. Construction funding to complete most of a safe, handicapped accessible trail is available now. The NPS has no existing or proposed funding to construct their preferred alternative in a timely manner. Never-the-less, the Spruce Railroad Trail should be handicapped accessible and safe for all users, irrespective of Clallam County involvement, connecting to the Olympic Discovery Trail or the availability of current funding!

The NPS regularly interacts with private landowners and local governments to accomplish its mission. At the public presentation of the SRRT EA, park personnel said they were not allowed to contact private landowners to solve the issue of trail slope, which in their preferred alternative is far in excess of handicapped access limits. Clallam County has an agreement with an adjoining landowner which achieves maximum 8% grades, provides level areas every 200' and meets handicap requirements. There are numerous private landowners and private structures on the shores of Lake Crescent. The steep section of the Park's proposal is not wilderness. Work with the adjacent landowner and make the Spruce Railroad Trail accessible to our wounded veterans and all handicapped visitors! This is a clear and vital advantage over the corresponding section of the EA preferred alternative.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 69

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Seattle, WA 98103
USA
E-mail: [REDACTED]

Correspondence Information

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I support Alternative #4 - Wheel chair access for the Spruce Railroad Trail. The grade of the trail is perfect and the need is great for more wheelchair accessible trails within the Olympic National Park.

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Correspondence: 70

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information

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Topic Question 1:
No comment

Topic Question 2:
See my letter in your comments section,at the bottom of this page.

Topic Question 3:
See my letter in your comments section,at the bottom of this page.

Topic Question 4:
No comment

Topic Question 5:
See my letter in your comments section,at the bottom of this page.

Topic Question 7:
See my letter in your comments section,at the bottom of this page.

I'm appalled at the ONP's attempt to block a wheelchair accessible addition to the Spruce Railroad Trail at Lake Crescent, and its release of a factually flawed environmental assessment for public comment in trying to push their discriminatory proposal forward. The County has provided a funded design that would be ADA accessible. Why is the ONP so intent on dismissing that proposal? How hypocritical of the ONP - a federal entity - to take this stance, flying in the face of ADA options, which originate in federal law.

The ONP says their non-accessible proposal avoids tree removal, and relates to their legal obligation to preserve the railroad grade "as much as possible" for the National Historic Register. I am an environmentalist and a historian. I have a Ph.D. in environmental planning and have conducted research and written numerous technical reports concerning land use and environmental protection, as well as historic preservation of structures, neighborhoods and other cultural resources. I know from experience that there is wiggle room in the historic designation procedure. I personally see little value in preserving an historic area 100% if it results in many citizens not even being able to view it because they can't access it! Isn't it better to preserve it "as much as possible" as the law suggests and make some compromises, utilizing the County proposal?

As a woman of African and Native American descent, I have viewed and experienced discriminatory practices during various times of my life and career. It has never been a pleasure. I find it disturbing and disappointing that the ONP would take a stance that discriminates against people with mobility challenges. This is 2011 ? not 1920.

Many people with disabilities and mobility challenges live in and visit our region. These are citizens who were born with disabilities as well as those who acquire these conditions after birth which include veterans, accident-survivors, victims of neuromuscular disorders, elders and let's face it ? us ? eventually, as we too age. Please provide the respect and courtesy that these citizens deserve by making it possible for them to access this lovely part of the world. Isn't that what National Parks are supposed to be about?

[REDACTED]

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 71

Author Information

Keep Private: No
Name: [REDACTED]
Organization: League of American Bicyclists
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Olympia, WA 98501
USA
E-mail: [REDACTED]

Correspondence Information

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Topic Question 3:

Too narrow a path will cause conflicts between trail users.

Topic Question 4:

For a shared use path, the 8-10 foot minimum guidelines established in the AASHTO bicycle facilities guide is a MINIMUM that MUST be adhered to.

Topic Question 7:

I would enjoy this trail if it is built wide enough, as per AASHTO standards.

I appreciate the interest in minimizing width, but that was done locally on some trails built before the AASHTO standard, and they do not work very well. Usership is more diverse than sometimes anticipated, and sub-standard width trails exacerbate conflicts that could have been avoided.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 72

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Tucson, AZ 85710
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/17/2011 Date Received: 10/17/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:
no

Topic Question 2:
clear

Topic Question 3:
No action would be unacceptable to current and future Olympic Discovery Trail users, and the county.

Topic Question 4:
As far as I know, no

Topic Question 5:
As far as I know.

Topic Question 6:
As far as I know.

Topic Question 7:
I would really enjoy the County's (revised) proposal, make a trip to Clallam County and ONP to use the trail, and personally thank Park personnel.

I believe proposal #4, by Clallam County (as revised currently) best meets the requirements of trail users in the environment. The use of non-motorized vehicles is consistent with ONP values and community relations.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 73

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Sequim, WA 98382
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/17/2011 Date Received: 10/17/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 2:
Yes, the information seems complete.

Topic Question 3:
Yes, the proposed 6 foot width of the trail is unsafe.
For the section to be safe for all users, the minimum of 8-10 feet is required.

Topic Question 4:
The guidelines established in the AASHTO bicycle facilities guide is a MINIMUM that must be adhered to for safety on a multi-use trail.

Topic Question 5:
No, please refer to the above-mentioned AASHTO facilities guide to make sure that the trail improvements will be safe and consistent with shared user guidelines.

Topic Question 7:
I would not feel that the trail was safe to cycle on if the minimum width was six feet. There would not be room to safely pass pedestrians. As a pedestrian I would also not feel safe without room for bicycles to pass.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 74

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Seattle, WA 98177
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/17/2011 Date Received: 10/17/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 3:

I support making this section of the Spruce Railroad Trail accessible for people of all ability levels, especially including those with disabilities! Please consider making the trail as accessible as possible.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 75

Author Information

Keep Private: No
Name: [REDACTED]
Organization: [REDACTED]
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98363
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/17/2011 Date Received: 10/17/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:

It's clear that Alternative 4, which Clallam County has funding, and meets all the qualifying factors for a federally approved ADA trail is the only alternative that will achieve the results of completing a trail that is accessible to all the users.

Topic Question 3:

Other than Clallam County's plan, the other options will not work because they will not qualify for the available funding that is already appropriated by the county for this project. One of the plans would limit this section of trail to people in wheelchairs. The alternative's that limit the width of the trail will not safely allow horses to pass other users.

Topic Question 4:

Not that there is funding for. I find it difficult to understand the concerns about adverse impacts. This was once a railroad bed, not a pristine wilderness!

Topic Question 5:

Yes.

Topic Question 6:

Yes.

Topic Question 7:

It would definitely increase my use of the Spruce RR trail because right now it's not very accessible to horse people (limited trailer parking) and the trail is quite narrow and not safe to pass in many places. We will continue to use the

other back country trails, but this trail would be great to take visitors on because it's close to our house.

I am entirely in favor of continuing this wonderful trail system that the county has so diligently designed and researched to bring much needed revenue from hikers, bike riders and horseback riders into our area. The completion of this section of trail is so vital to the continuing of the Olympic Discovery Trail heading west.

I am not happy with the way the ONP has stalemated and tried to sway the public away from this trail, often with incorrect, skewed and outdated information.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 76

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Kenmore, WA 98028
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/19/2011 Date Received: 10/19/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:
Trail width minimums.

Topic Question 2:
For a shared use path, the 8-10 foot minimum guidelines established in the AASHTO bicycle facilities guide is a MINIMUM that MUST be adhered to - And as experienced cyclists, we KNOW, based upon our own personal experiences, that a 6 foot path is unsafe for all users.

Topic Question 3:
The 6' minimum width would be unsafe

Topic Question 4:
See #2 above.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 77

Author Information

Keep Private: Yes
Name: N/A N/A
Organization: Friends of ONP
Organization Type: I - Unaffiliated Individual
Address: Port Angeles, WA 98362
USA

E-mail:

Correspondence Information

Status: Reviewed	Park Correspondence Log:
Date Sent: 10/19/2011	Date Received: 10/19/2011
Number of Signatures: 1	Form Letter: No
Contains Request(s): No	Type: Web Form
Notes:	

Correspondence Text

Preference should be given to Alt 4 to increase ADA opportunities in the Park.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 78

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information

Status: Reviewed Park Correspondence Log:
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Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

My daughter, [REDACTED] was a passionate advocate for maximum accessibility of trails throughout her 20 years. She passed away suddenly and unexpectedly in July, 2010, but she had already, in her wheelchair, traveled most of the Olympic Discovery Trail available to that time. If she were alive, she would be submitting a strongly worded plea for an entire Spruce Railroad segment that she could access as well as she could all of the rest of the ODT. How odd she would think it to have the only portion of the ODT that didn't meet federal ADA standards be that portion that lies within federal lands!

She also was very interested in accessible trails within ONP, and noted that although some success has been achieved in building such trails, there have been no new accessible trails, or existing trails made fully accessible, in the last few years. This is a golden opportunity to build a premiere accessible national park trail!

The 18% grade of portions of Alternative #3, as well as its narrower paving, will make it difficult to use for a considerable portion of our populace, not just those who use a wheelchair. Since ONP has a legal mandate to make trails fully accessible where possible, and it is clearly possible here, this seems like an great opportunity to fulfill that mandate.

Alternative #4 MUCH better meets the needs of potential trail users since it alone meets ADA criteria. I strongly encourage its selection as opposed to #3.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 79

Author Information

Keep Private: No
Name: Barbara J. Culp
Organization: Bicycle Alliance of Washington
Organization Type: I - Unaffiliated Individual
Address: 1056 25th Avenue East
Seattle, WA 98104
Seattle, WA 98104
USA
E-mail: [REDACTED]

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 10/19/2011 Date Received: 10/19/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:

Why would any alternative choose to violate the ADA? (New construction and altered facilities must be ?accessible to and usable by? people with disabilities. (ADA Title II and Rehabilitation Act Section 504)

Topic Question 2:

Carefully review Recreation Regulations of the ADA.

Topic Question 3:

Federal compliance.

Topic Question 7:

If the ONP decides to build a 6' wide trail, all future trail users will be adversely affected.

Thank you for the opportunity to submit public comment on the preferred alternative for the Spruce Railroad Trail segment on the Olympic Discovery Trail. The Bicycle Alliance has a long history of supporting safe trail projects for active transportation and recreation, and the economic benefits that trails bring with them.

The Olympic Discovery Trail as planned is a 120 mile treasure with 40 miles of existing AASHTO compliant shared use path. The 11 mile section that passes through the Olympic National Park is critical ? it's a topographic chokepoint and a safety hazard for users as the route currently follows highway 101 along the south shore of Lake Crescent.

The Bicycle Alliance has reviewed the alternatives and urges the Olympic National Park acknowledge and accept two principles of shared use paths to create a safe experience for all:

1) To adopt the Olympic Discover Trail standard of 10' with an allowance for 8' in limited to low traffic areas. A 6' shared use path is unacceptable and unsafe for all users unless it is a one-directional shared use path which is not the case on the Spruce Railroad Trail;

2) The Olympic Discovery Trail, of which the Spruce Railroad Trail is a continuation, is committed to universal accessibility and all federally funded trails must be designed to meet the standards universal accessibility. (New construction and altered facilities must be "accessible to and usable by" people with disabilities. (ADA Title II and Rehabilitation Act Section 504)

It is shameful that the Olympic National Park would consider constructing a trail that is not ADA accessible as set out in the Recreation Regulations.

Please reconsider your actions, and choose an alternative that embraces AASHTO standards of 10' with an allowance for 8' in limited traffic areas, as well as a trail built to accommodate all users.

Thank you,

Barbara Culp
Executive Director
Bicycle Alliance of Washington

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 80

Author Information

Keep Private: No
Name: Bob Lynette
Organization: North Olympic Group of the Sierra Club
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Carlsborg, WA 98324
Sequim, WA 98382
USA
E-mail: [REDACTED]

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 10/19/2011 Date Received: 10/19/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:
No

Topic Question 2:
Closer correlation to the requirements of the Shoreline Management Plan for Clallam County.

Topic Question 3:
see below letter

Topic Question 4:
see below letter

Topic Question 7:
Will lessen enjoyment of the wilderness aspects of the trail.

North Olympic Group of the Sierra Club
[REDACTED]
Carlsborg, WA 98324

Sent via email
October 19, 2011

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

Re: Sierra Club comments - Spruce Railroad Trail Expansion and Improvement EA

Dear Superintendent Gustin,

The Sierra Club has more than 1.2 million members in the United States, 25,000 in Washington State, and 850 living here on the north Olympic Peninsula. Our mission is to explore, enjoy, and protect the planet. We try to find a reasonable balance between enjoying and protecting our natural resources if the two goals conflict. It is with that in mind, on behalf of the North Olympic Group, we respectfully submit the following comments on Olympic National Park's Spruce Railroad Trail Expansion and Improvement Environmental Assessment (EA).

We are in general agreement with Olympic Park Associates position to support the Park's preferred alternative 3, but as modified below. This approach provides for a range of trail uses, preserves natural and cultural resources, and maintains trail users' experience in keeping with the outstanding natural values of Olympic National Park. One exception to alternative 3 would be to use the tread width described in Alternative 2. This provides the least impacts to park resources, while fully meeting the purpose and need of the project. The reduced and narrower tread of Alternative 2 would still allow hikers, bicyclists, equestrians, and disabled access on the trail, while reducing the impacts and costs to the park. The narrower tread called for in Alternative 2 also allows for less amendment of the 2008 GMP. Currently, the maximum tread width allowed in the GMP is 60 inches. Alternative 3 calls for a tread width of 120 inches, twice the current allowance.

We strongly oppose the wider, 8-foot asphalt surface, turnouts, and wider trail profile proposed in the Clallam County alternative 4. This standard is inappropriate for trails Olympic National Park where resource protection and preserving natural character are high priorities. For these reasons we also oppose the level of new trail construction (Segment D) proposed in Alternative 4, which in our view constitutes new road construction through natural second-growth forest habitat. This approach, or any significant modification in the direction of the County's proposal to trail development, is inconsistent with the mandates governing management of our national parks and almost certainly would trigger the requirement for a full EIS.

However, while generally favoring the preferred alternative, we are deeply concerned over the level of shoreline armoring under both the preferred and County alternatives. This treatment has deleterious impacts on the lake's fisheries, which include rare and endemic stocks, as well as on nearshore habitats, which may include populations of water lobelia, a Washington state threatened species. As you know, shorelines are critical rearing and early-life habits for a number of fish species. Bank armoring eliminates shade, nutrient inputs, and protective cover for juvenile fish. Best management practices while installing rip-rap fails to address these larger habitat issues. We urge NPS to seek more resource-friendly alternatives to bank armoring in these cases, and to incorporate wood (as was used in the Hoh River boat launch), plantings or other mitigations to lessen the impacts of bank armoring to the lake's aquatic environment.

We also question the need to pave the expanded parking area on East Beach Road, and would request that a pervious surface be used.

Lastly, please consider closing the bypass trails around the east and west tunnels to all but foot traffic to preserve a remnant of traditional trail use and offering an opportunity for quiet appreciation of the lakeshore free of wheeled and hooved traffic.

We urge you to resist popular pressure to comply with state and County road standards. Please manage this project in a way that reflects the trail's location in one of our nation's most magnificent natural preserves. Thank you for your attention.

Respectfully,
Bob Lynette and John Woolley
Co-Chairs, North Olympic Group of the Sierra Club

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 81

Author Information

Keep Private: No
Name: Tessa Greegor
Organization: Cascade Bicycle Club
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
[REDACTED]
Seattle, WA 98115
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/19/2011 Date Received: 10/19/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

October 19, 2011

Superintendent, Olympic National Park
Attn: SRRT EA
600 E Park Ave.
Port Angeles, WA 98362

RE: Cascade Bicycle Club Comments regarding the Olympic National Park Spruce Railroad Trail Expansion and Improvement Environmental Assessment

To Whom It May Concern:

On behalf of Cascade Bicycle Club and our more than 14,000 members, we appreciate the opportunity to provide public comment on Spruce Railroad Trail Expansion and Improvement Environmental Assessment. The Olympic Discovery Trail provides a tremendous recreational and transportation asset to tourists and residents of the area and we strongly support the extension of this nonmotorized facility. We have significant concerns, however, with the design of the Preferred Alternative as selected by the National Park Service, specifically its failure to adhere to national and state shared-use trail design and accessibility standards. We strongly urge the National Park Service to ensure that the Spruce Railroad Trail Expansion is designed to meet American Association of State Highway and Transportation Officials (AASHTO) and WSDOT shared-use path design standards, while adhering to the Access Board's 2011 Advance Notice of Proposed Rulemaking guidelines for the development of shared-use paths.

The Preferred Alternative specifies a six-foot wide paved surface adjacent to a four-foot gravel equestrian trail. Six

feet of paved surface is an insufficient and unsafe width for two-directional bicycle and pedestrian traffic, and moreover fails to meet nationally accepted and statewide standards for the design of shared-use pathways. The AASHTO Bicycle Facility Guidelines specify a 10-foot paved width for a two-directional shared-use path. In rare instances, when bicycle traffic is expected to be low (even on peak days), and pedestrian use of the facility is not expected to be more than occasional, AASHTO suggests 8 feet may be adequate.

We anticipate the Spruce Railroad Trail extension, in connection with the existing 62 miles of the Olympic Discovery Trail, to be a highly attractive nonmotorized corridor and therefore do not believe the 8-foot minimum guidelines to be adequate in this situation. To support safe and desirable bicycle and pedestrian travel along this corridor, and in line with the WSDOT Design Manual's recommendations for shared-use path design, we recommend the paved width of the Spruce Railroad Trail extension to be at a minimum 10 feet, in addition to the 4-foot gravel path.

The proposed width of the Preferred Alternative not only fails to meet AASHTO bicycle facility guidelines, but also does not comply with the Architectural and Transportation Barriers Compliance Board's (Access Board) 2011 Advance Notice of Proposed Rulemaking for creation of shared use paths, which cites the AASHTO 8-10 feet minimum standard as the required shared-use path width to ensure ADA compliance.

The Spruce Railroad Trail expansion provides a critical link in the Olympic Discovery Trail (ODT) system, a key regional nonmotorized transportation and recreation facility. Currently, 40 miles of the ODT are designed to AASHTO specifications. Creating a deficient link in this trail system is a missed opportunity and more importantly a potential safety hazard for its users. We strongly encourage the NPS to adopt a design that adheres to AASHTO, WSDOT and accessibility standards, meeting necessary requirements to serve as transportation and recreation corridor for nonmotorized users. We appreciate the opportunity to provide public comments as the National Park Service considers alternatives for this trail corridor. We believe this is a unique opportunity to provide a high quality nonmotorized facility linkage in what will ultimately be a 140-mile nonmotorized trail.

Sincerely,

Tessa Greegor
Principal Planner
Cascade Bicycle Club

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 82

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/20/2011 Date Received: 10/20/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:
I would like to support alternative 4.

Topic Question 2:
Yes information seems clear.

Topic Question 3:
Other alternatives except 4 would not be acceptable for persons in wheelchairs.

Topic Question 4:
No

Topic Question 5:
Not sure

Topic Question 6:
Yes

I strongly recommend Alternative 4 to allow the trail to be wheelchair accessible. thank you very much for your attention.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 83

Author Information

Keep Private: No
Name: [REDACTED]
Organization: Peninsula Trails Coalition
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles
Port Angeles, WA 98363
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/20/2011 Date Received: 10/20/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:
No

Topic Question 2:
Information is not accurate, and additional information is supplied below

Topic Question 3:
See Below

Topic Question 5:
No See below

The Peninsula Trails Coalition (PTC) objects to the ambiguous treatment given the Olympic Discovery Trail (ODT) in the Spruce Railroad Trail (SRRT) Environmental Assessment. (EA). The EA makes numerous references to the ODT, including language from the Park General Management Plan that specifically identifies the SRRT as a part of the ODT, and language that identifies the 6.5 miles of phase 1 of this project as a "proposed section of the ODT". There is no "proposed" about it. Phase 1 was funded, designed, and built as a segment of the ODT. It is ODT. The EA makes it clear that the Preferred Alternative (PA) will connect directly to both the ODT phase 1 within the park, as well as ODT currently under construction adjacent to the western park boundary. On the eastern end, the PA proposes paving Waterline Road to the park boundary. Clallam County has executed an MOU with DNR that specifically identifies Waterline Road as a segment of the ODT. Despite these clear connections to existing ODT both within and immediately adjacent to the park on both east and west ends of the project, the PA fails to meet the minimum width and accessibility standards established for the ODT.

The design standards of the ODT have been developed collaboratively by the 9 state, county, federal, city, and tribal jurisdictions that host the ODT. All jurisdictions (including the NPS up to this point) have agreed on a single design standard, put forth by AASHTO for shared use paths. It is not within the purview of the National Park Service to unilaterally define design standards for the ODT. The NPS can either accept the standards which have been developed by the ODT consortium, or decline. If the NPS wishes to apply different standards, they should make it clear in the EA that the PA will not meet ODT standards, and that the PA is NOT intended to be a part of the ODT.

The SRRT upgrade project is either intended to be a part of the ODT, or it isn't. If it is, it needs to meet ODT standards. If not, this should be clearly spelled out. The current language in the EA attempts to portray the PA as an acceptable part of the ODT. This contention is rejected by the other members of the ODT consortium. The consensus among consortium members is that the PA will create a gap in the middle of the ODT, breaking the continuity of the 126 mile long pathway and destroying the primary vision and purpose of the path, which is an unbroken route from Port Townsend to La Push.

If the NPS chooses to proceed with the PA, all language relating to the ODT should be removed from the EA. If you have no intention of creating a section of ODT, consideration of ODT connections is unnecessary. The current language attempts to portray the PA as acceptable as ODT, when that is not the case.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 84

Author Information

Keep Private: No
Name: Andrew J. Stevenson
Organization: Peninsula Trails Coalition
Organization Type: I - Unaffiliated Individual
Address: 653 Seal Rock Rd.
Port Angeles
Port Angeles, WA 98363
USA
E-mail: [REDACTED]

Correspondence Information

Status: Reviewed Park Correspondence Log:
Date Sent: 10/20/2011 Date Received: 10/20/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:
No

Topic Question 2:
No, the information is not complete and accurate. Yes, I have additional information. See below

Topic Question 3:
Yes, see below

Topic Question 5:
No, see below

Peninsula Trails Coalition and Clallam County have been working with the National Park Service to establish an 11 mile route for the Olympic Discovery Trail (ODT) through the park along the north shore of Lake Crescent utilizing the decommissioned railbed of the Spruce Railroad. This effort has been ongoing for more than 15 years, and has resulted in the construction of 7 miles of AASHTO compliant ODT shared use pathway in the park, reaching from the western park boundary eastward towards the park limits at the head of the Lyre River. After the construction of phase one in 2009, the ONP staff determined that the remaining 4 miles of pathway (phase 2) would need to be the subject of an Environmental Assessment (EA) to examine the impact on the lakeshore environment. Sadly, the preferred alternative (PA) chosen by the ONP differs substantially from the design used for phase 1, proposes a pathway that is demonstrably unsafe for the intended users, and that fails to meet key criteria (be part of the ODT, universal accessibility) described in the GMP, LCMP, and "Purpose and Need for Action". The PTC has received substantial negative comment regarding the preferred alternative from federal, state, and county transportation

agencies, national, regional, and local bicycling organizations, local business interests, and citizens regarding the PA. The PTC has conducted an extensive fact finding canvass to ensure that we have a clear understanding of appropriate regulations and standards which should be applied to the SRRT, and it is notable that during this canvass, we did not encounter a single organization or agency (including some branches of the NPS itself) that was willing to endorse the design proposed by the ONP as either safe or appropriate. Our objections to the PA revolve around two key issues, path width and ADA accessibility.

From the perspective of the PTC, there are elements of the EA that we find commendable. The PA endorses the concept of the upgraded SRRT as a "shared use path", language that denotes a user community and range of uses that is identical to our standards for the ODT. They have embraced the users, goals and needs PTC has identified as characteristic of the ODT. Inexplicably, however, the path design advocated in the PA fails to provide a facility that meets the safety and usability needs of the target users. The PA specifies a 6 foot paved shared use pathway and adjacent 4 foot gravel stock path. The 6 foot path is too narrow to meet universally accepted safety standards for shared use pathways. The PA is not ADA compliant over its entire length. PTC cannot understand why ONP staff has chosen to endorse this inadequate design.

By proposing a 6 foot wide Shared Use Path (SUP) ONP has ignored the safety requirements of road cyclists, part of their identified users. They have chosen to design to an ambiguous, unclear, clause in a guideline tentatively proposed by the ADA Access Board for shared use pathways rather than the universally accepted AASHTO standard (see footnote 2). The Access Board has only just begun to develop its shared use path guidelines, and the document the ONP is using to support its design was published as essentially a "request for public comment" on some concepts the Board is considering for a draft guideline to be published in the future. It is unquestionably inappropriate to apply these "ideas" as robust standards. The Access Board is not charged with assuring the safety of all users, and their minimums are designed to ensure safety for the disabled, not for all users. They state "Since our authority and mandate is limited to developing minimum accessibility guidelines and not provisions for bike paths, we must focus our attention on the "minimum" criteria to serve persons with disabilities" (see footnote 1). In contrast, AASHTO standards are designed specifically for bicycle facilities, but also address universal accessibility, ensuring safety for all users. Using a preliminary request for comment, the very first step in rulemaking for the Access Board, as though it were a robust, reviewed, accepted guideline, especially when it is so directly in conflict with a universally accepted standard, is irresponsible (see footnote 2). PTC understands that ONP is not required to adhere to the AASHTO guidelines. ONP is, however, required to build a facility that is safe for all users. Voluntarily following AASHTO guidelines ensures such an outcome. Using the Access Board ANRM does not. The Access Board itself councils against using the 5 foot minimum for the SRRT, and states "Following AASTHO guidance and exceeding our minimums is recommended" (see footnote 1).

It is a mistake to depend on the ANRM to ensure a safe design for all users. I feel this is a mistake. All the bicycle organizations I have contacted feel this is a mistake. WSDOT (Washington State Dept. of Transportation) and the FHWA (Federal Highway Administration) feel this is a mistake. The Access Board itself has stated this is a misuse of its guidelines (see footnote 1). I have yet to talk to any knowledgeable entity who feels this is appropriate. All the advice I have received supports pathway widths of 10 feet -12 feet.

Language throughout the EA makes it clear that the ONP does not consider the 6+4 option as a single trail. It is unacceptable to consider the paved and gravel paths together as a 10 foot shared use path. The ONP description is consistently for a "6 foot shared use pathway and immediately adjacent 4 foot gravel stock trail". The ONP states that a gravel surface used by stock will not meet ADA or shared use path accessibility standards for surface smoothness or traction. We concur with that position.

ONP staff has repeatedly stated its position that "A 6 foot wide paved shared use path is safe for all users." They cannot provide a single bicycle safety expert who agrees. PTC maintains that 8 feet is an absolute minimum for

safety, and can provide an extensive list of national, regional, and local government agencies and cycling organizations that have examined the PA and deem it unsafe. This should be clear from the comments ONP has received from the League of American Bicyclists, the Rails to Trails organization, the Bicycle Alliance of Washington, Cascade Bicycle Club, Clallam County, the city of Port Angeles, WSDOT, and a host of others. The conclusion is unanimous, 6 feet is not safe.

The PTC recommends ONP adopt the tread configuration used in phase 1 for phase 2, an 8 foot paved path and adjacent 4 foot stock trail (8+4). This configuration represents the absolute minimum safe width for the Shared Use Path segment, and provides a suitable stock trail. This configuration has already been approved by the State Dept. of Archeology and Historic Preservation and the ONP when they evaluated the phase 1 design. This tread configuration, when coupled with the construction techniques and historic preservation measures detailed in the PA, will result in a pathway that will meet the demands for protection of historic cultural resources and will result in the minimum environmental impact necessary to create a facility that is safe for ALL the identified user groups.

FOOTNOTES

FOOTNOTE 1: Email exchange illuminating the Access Board recommended standards

From: Greenwell, Peggy [mailto:greenwell@Access-Board.gov]
Sent: Monday, July 25, 2011 5:57 AM
To: Lasorsa, Dave
Subject: RE: Shared Use Path Widths and AASHTO

Hi Dave ? Thanks for your question. We (the Access Board) and AASHTO have a long history of working together in providing guidance on making shared use paths accessible for persons with disabilities. Previously, AASHTO's (with our concurrence) guidance on accessibility for shared use paths was more consistent with our draft provisions for trails. Over time, the Board recognized that while shared use paths are a "type" of trail, they are very different from park trails both in their function and use. This led the Board to develop specific accessibility guidelines for shared use paths. We recognized that where the AASHTO guidelines are used, SUP's must be 10' wide or 8' in some cases. In some cases, however, a SUP may be designed without using the AASHTO guidelines since these guidelines are not required and/or mandatory in all locations. Since our authority and mandate is limited to developing minimum accessibility guidelines and not provisions for bike paths, we must focus our attention on the "minimum" criteria to serve persons with disabilities. This is why we established a 5', recognizing that if you are following AASHTO you would (and should!) far exceed this minimum. This issue has generated a fair amount of comment, with many commenters favoring a 10' minimum. Our next step is a notice of proposed rulemaking where will refine the draft guidelines for additional public comment. That said, we have a few more years before this will be final on our end. Following AASTHO guidance and exceeding our minimums is recommended. Let me know if you need further assistance. Thanks, Peggy Greenwell

From: Lasorsa, Dave [mailto:DLasorsa@co.clallam.wa.us]
Sent: Thursday, July 21, 2011 5:39 PM
To: Greenwell, Peggy
Subject: Shared Use Path Widths and AASHTO

Peggy,

I realize you may not be able to answer this, and with the current rulemaking on Shared Use Paths, you may not even be allowed to. However, we have a very unique situation (opportunity) and we want to get this right from the

start.

Clallam County (WA) is funding (through grants) the conversion of 4 miles of former railroad grade within Olympic National Park into a shared-use, Universally Accessible trail. The trail will serve multiple functions, including the connection to a larger network of accessible cross-county trails and also an important alternative transportation for bicyclists who currently must negotiate around Lake Crescent, on US HWY 101. This multiple-use trail will have a paved surface for wheelchair users, pedestrians and road bicyclists, plus a softer gravel shoulder for horseback riders and hikers/mountain bikers. We will, of course, be following (or exceeding) the minimum standards of the 2009 Draft Guidelines for Outdoor Developed Areas.

Clallam County, along with ONP, are working on design of trail alternatives. The County would like to see a paved width of 8', just meeting AASHTO standards (with permission). ONP is favoring a 6' paved width. We realize that going to anything less than 8' would not qualify us for future federal (FHWA) funding, and this is obviously a concern. The proposed rulemaking is a little confusing on Technical Provision #4:

Width. The clear width of shared use paths shall be 5 feet (1.5 m) minimum.

The AASHTO Bicycle Facilities Guide recommends the paved width for a shared use path to be 10 feet minimum. Typically, widths range from 10 to 14 feet with the wider ranges in areas with high use or when planning for a wider variety of user groups. In very rare circumstances, a reduced width of 8 feet may be used. Wider shared use paths also are recommended where the path is used by larger maintenance vehicles; on steep grades to provide additional passing area; or through curves to provide more operating space.

The Board is considering requiring accessible shared use paths to provide at least 5 feet minimum width to address those rare circumstances where the AASHTO Bicycle Facilities Guide is not applied so that sufficient space is provided for wheelchair turning and to allow wheelchair users and others to pass one another.

I'm not clear on the intent of that last sentence: "to provide at least 5 feet minimum width to address those rare circumstances where the AASHTO Bicycle Facilities Guide is not applied." What is meant by "rare circumstances?"

As I said, we want to get this right from the start ? if the intent is to apply AASHTO Bicycle Facilities standards, is the 5' minimum width only for exceptional circumstances ? such as when the trail may have to be narrowed to avoid a physical obstruction? With over 4 miles of old railroad grade, an 8' wide paved surface should not be an issue for construction.

Thank you. Any guidance, even suggestions, would be helpful.

Dave Lasorsa

FOOTNOTE 2: Shared Use Path Standards (and the ONP Preferred Alternative)

American Association of State Highway and Transportation Officials (AASHTO)

The "Shared Use Path" concept and pathway category has been developed primarily within the transportation sector, as opposed to the recreation sector. As a result, until recently, the only widely accepted source of design standards for shared use pathways have been those developed by AASHTO. Their guide, "AASHTO Guide for Development of Bicycle Facilities" was first published in 1981 and was updated in 1999 and 2010 (draft). This publication provides guidance on the design, maintenance, and operation of bicycle facilities, including shared use pathways. It is important to note that the AASHTO standards are developed to insure BOTH the safety of all pathway users AND compliance with the requirements of the ADA for mobility impaired users. The AASHTO design standards are (almost) universally accepted by transportation planners and form the basis for shared use pathway design standards in most states, counties, and cities where such standards exist. The Federal Highway Administration (FHWA), Washington State Dept. of Transportation (WSDOT), and the State of Washington base their standards on AASHTO, as do both Jefferson and Clallam Counties and all the other jurisdictions that the ODT passes through, with the exception of the Olympic National Park.

AASHTO calls for a minimum tread width of 10 feet in most cases. The standards allow for an 8 foot minimum width in areas of "minimum traffic". Most federal and state standards (including WA and FHWA) derived from

AASHTO do not contain the 8 foot minimum, and many (WA included) set minimums greater than 10 feet.

Architectural and Transportation Barriers Compliance Board (Access Board)

The Architectural and Transportation Barriers Compliance Board is part of the United States Access Board, a federal agency responsible for creating design guidelines that implement the provisions of the ADA. The Access Board is solely concerned with the needs of disabled users. This focus is fundamentally different from AASHTO, and does not consider the needs and safety of non-disabled users. It is my understanding that federal agencies (such as the NPS) are required to meet Access Board design criteria when constructing trails or paths designated for "universal access" or "ADA compliance". Prior to this year, the relevant Access Board standards were contained in the "Draft Final Accessibility Guidelines for Outdoor Developed Areas" which was released in 2009. This document makes reference to "shared use pathways" as a distinct trail type, and indicates that the Board

"plans to conduct a separate rulemaking in the future to address shared use paths because they are also used for transportation purposes and may be subject to higher design standards".

In March 2011, the Access Board released an "Advance notice of proposed rulemaking" (ANRM) which acknowledges the "Shared Use Path" concept as a distinct class of trail that has design requirements additional to those specified in the "Draft Final Accessibility Guidelines for Outdoor Developed Areas", and proposes some design criteria for evaluation and discussion. The language of the ANRM makes clear the purpose is to provide some proposed design criteria for discussion and comment, not to provide detailed technical design standards for application. The format and content is laid out as a solicitation of comment, not an exposition of rules. The minimum width criteria are presented as conceptual, without details regarding its application or constraints regarding its use. It is completely inappropriate to use the ANRM as a design guide. It is clearly beyond the intention of the Access Board, as it is questionable as to what, if any, of the proposed criteria will be incorporated into the "Draft Final Accessibility Guidelines for Shared Use Pathways", the implementation document which will follow the ANRM and which is currently under development by the Board. When the draft guidelines for shared use pathways are issued, it is the Boards' intention that they will represent a fusion of AASHTO and the Access Board thinking to produce a single, uniform, set of guidelines for shared use paths.

The ANRM language makes clear the respect and value the Access Board places on the AASHTO standards, and in most instances, the criteria proposed by the ANRM are equal to or exceed those contained in AASHTO. There is, however, one significant point of difference where the Board proposes a substantial requirement downgrade to the AASHTO standard, and this is regarding trail width. The ANRM states:

"The Board is considering requiring accessible shared use paths to provide at least 5 feet minimum width to address those rare circumstances where the AASHTO Bicycle Facilities Guide is not applied so that sufficient space is provided for wheelchair turning and to allow wheelchair users and others to pass one another."

There is no further discussion or guidance as to why AASHTO might not be applied, nor any context as to what circumstances would be considered valid to support 5 feet. It is clear that using the above conditional, vague, undefined language as the design basis for an entire shared use path trail class, as the ONP staff propose to do, is inappropriate. In summary, the Access Board documents make it clear that:

- 1) The Draft Final Accessibility Guidelines for Outdoor Developed Areas should not be used for shared use pathways
- 2) The ANRM for Shared Use Pathways is not usable as a standard
- 3) The Board considers the AASHTO guidelines to be the appropriate standard at the current time.

Perhaps the most telling argument against using the 5 foot minimum comes from the Access Board itself. When questioned specifically about the ONP proposal and the 5 foot minimum, a board representative stated "Following AASHTO guidance and exceeding our minimums is recommended." ONP has rejected this advice.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 85

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Sequim, WA 98382
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
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Contains Request(s): No Type: Web Form
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Correspondence Text

Topic Question 4:

Spruce Railroad Trail user I agree with the many commenters that an 8 foot width would be much safer for a ?multi-mode? trail for walkers and wheel chair bound users being passed by bicyclist than the proposed 6 foot width. However, for handicapped and senior walkers, the more important objection I have is the 18% grade being retained for historical considerations. This will likely become among the most used segment of the Discovery Trail system and possibly in the NOP system, so please reconsider and bring the new trail up to or exceed ADA standards.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 86

Author Information

Keep Private: No
Name: Andrew J. Stevenson
Organization: Peninsula Trails Coalition
Organization Type: I - Unaffiliated Individual
Address: 653 Seal Rock Rd.
Port Angeles
Port Angeles, WA 98363
USA
E-mail: [REDACTED]

Correspondence Information

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Correspondence Text

Topic Question 1:
No

Topic Question 2:
No, see below

Topic Question 5:
No, see below

Topic Question 6:
No, see below

The Peninsula Trails Coalition wishes to object to the failure of the Preferred Alternative (PA) to achieve ABA/ADA criteria for universal accessibility over segment D. The PA incorporates an unacceptable grade at the east end of the SRRT. From the Lyre River trailhead, there will be a steep (18%) climb for ~ 1000 ft. to work around private property. The modified route proposed by Clallam County takes a different route, which necessitates acquiring a small (1540 square foot) easement or right of way across an undeveloped private parcel, and then creating ~800 ft of new trail route through "undisturbed" forest. The proposed modifications to the route of the PA combined with land acquisition currently underway by the County will provide a viable right of way that allows for a universally accessible path on segment D. Despite this opportunity, ONP continues to contend that they would not approve the additional environmental impact necessary to achieve universal accessibility (Todd Seuss, personal comm.).

The Olympic Discovery Trail (ODT) is intended to be an ADA/ABA compliant, universally accessible, facility. All new construction on the ODT is required to meet this standard. By failing to meet these criteria, ONP continues to demonstrate its unwillingness to abide by the standards of the ODT, while continuing to maintain that phase 2 is suitable for inclusion into the ODT system. Either the SRRT phase 2 is designed to ODT standards, or it isn't. It is not acceptable for ONP to unilaterally dictate trail standards to the ODT consortium.

The PTC considers ADA/ABA universal accessibility over the entire route to be a required standard for phase 2. We endorse the route modifications and grade profiles proposed by Clallam County for segment D. We feel these elements, coupled up with the superior construction techniques incorporated in the PA, and incorporating an 8+4 tread design, will result in the minimum environmental impact necessary to provide a facility that is safe for all users, and universally accessible.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 87

Author Information

Keep Private: No
Name: Dean W. Moberg
Organization: Federal Highway Administration
Organization Type: I - Unaffiliated Individual
Address: 711 S. Capitol Way, Suite 501
Olympia, WA 98501-1284
Olympia, WA 98501
USA

E-mail:

Correspondence Information

Status: New Park Correspondence Log:
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Correspondence Text

Topic Question 1:

The actions are adequately described. The need for the document is however questionable. There is a pre-existing federally funded NEPA document that adequately describes the improvement and related impacts for this segment of trail. That decision process resulted in an alternative that meets ADA requirements and multi-use trail guidelines. Further, that alternative can be refined during final design to consider any issues ONP has brought to the table after that decision document was developed and signed.

Topic Question 2:

The document does not reflect information provided to the Park by Clallam County in response to the Park's invitation for comments on the administrative review of the EA prior to publication. Therefore, I conclude that the information in the document is not complete and accurate. Additionally, the information presented does not meet the requirements of an ADA compatible trail for use by all user groups. It effectively limits use by specific user groups that the Department of Justice will find unacceptable.

Topic Question 3:

Yes, the exclusion of ADA required access throughout the improvement corridor prevents the selection of any alternative containing that restriction. The proposed action does not construct a hard surface path of sufficient width to accommodate use by two-directional bicycle or wheelchair traffic. The proposed action does not provide a trail with grades that allow ADA accessibility. The proposed action does not meet the Olympic National Park Management Plan, which intends the Spruce Railroad Trail be upgraded to accommodate universal accessibility and meet ADA access standards. The revised Alternative 4 provided to the Park by Clallam County accomplishes all of these goals.

Topic Question 4:

YES. The recommended alternative presented in the pre-existing NEPA decision document with revisions to reduce the taking of trees, and minimize impacts to the Park is a more reasonable and appropriate action. Revision during final design is a common practice, and could easily have accommodated Park concerns, saved tax-payer funds, and led to an acceptable solution. Even though the revised design with updated information on impacts was provided to the Park, it was not considered in the document.

Topic Question 5:

NO. The legal mandates require the provision of an ADA accessible improvement. The proposed improvement does not provide an ADA accessible facility. Those mandates apply to the expenditure of federal funds regardless of the funding organization. That is the National Park Service will be required to comply with ADA accessibility just as is the Department of Transportation.

Topic Question 6:

It does not appear to be. The information provided by Clallam County during the administrative review to the Park prior to publication is not reflected in the decision document. Therefore, the impacts cannot be considered accurate and complete.

Topic Question 7:

The improvement as proposed creates a "bottle neck" in accessibility by not adequately improving 4 miles of a trail in the middle of a proposed 140 mile long trail development known as the Olympic Discovery Trail. It makes me wonder if the Park is consciously striving to restrict access and thereby reduce the use of the trail and ultimately the Park. I would love to make use of this facility once it is completed if it is a safe experience. I will likely not if the improvement is carried out as proposed. Multi-use paths accommodate several levels of users in several groups. I have been personally involved in conflicts between walkers and avid cyclists on full width (12' paved) paths, and do not want to subject myself and my family to the conflicts I believe will occur on a 6' paved path. I believe an 8' paved path to be a reasonable middle ground although I still have reservations. However, the greater harm here is the inability of an entire group of citizens to use this segment of trail due to the ADA accessibility issues.

I question the need for this document. There is a pre-existing NEPA decision document, paid for with federal funds, which demonstrated a reasonable fully defensible project solution is available and deliverable. The Olympic National Park (Park) participated in the development of that decision document and produced work product used in it. There is documentation that the Park supported the results of the previous document, including the provision of a "No Effect" letter produced and signed by Park staff. In fact the history is that the Park supported the development of the Olympic Discovery Trail (ODT) from the initial planning phases through and including the publication and approval of the in-place NEPA decision document.

The conclusion that can be drawn is that the Park now wants to defend a solution that is different than the alternative resulting from the in-place NEPA decision document. NEPA allows a process to accomplish that objective under that existing NEPA decision document. That process involves the refinement of the alternative in final design and then conducting a re-evaluation of the NEPA decision process once that design evolution is complete. I suggest this would have been a much more productive, economical, and cooperative way to handle the Park's concerns than was beginning an entirely new NEPA process without reasonable consideration of the existing partners working to cooperatively deliver the Olympic Discovery Trail.

My final comments are that the proposed improvement does not meet the accepted width requirements for a shared use path, nor does it provide an ADA accessible route. The deficient minimum width of the trail as proposed will present a real and substantive safety concern because two-way traffic of bicycles and mixed modes will not have sufficient space easily pass one another. The ADA accessibility issue is an element of the proposal that is likely to

be legally challenged and determined by the Department of Justice to be unacceptable.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 88

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
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Correspondence Text

Topic Question 7:

The narrow width and steep grade would limit my families ability to use the trail as it is not ADA accessible.

As a annual park pass holder, mother to a son mobilty issues and a local physician caring for many patients with similar issues I hope that making the 3.5 mile segment ADA accessible will be reconsidered. It is the fair and right thing to do and would bring the ability to further enjoy the beauty of the Park to more people. I understand the Park's concern about trees and historical rocks, but it seems like a short segment to make compromises on.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 89

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information


Status: New	Park Correspondence Log:
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I support Alternative #4, making the trail wheelchair accessible. Understandably, there are so many limitations to handicapped persons from enjoying access to our beautiful Park that this Spruce Railroad Trail development seems it should have a high priority for making it wheelchair accessible.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 90

Author Information

Keep Private: No
Name: 
Organization:
Organization Type: I - Unaffiliated Individual
Address: Port Angeles, WA 98362
USA
E-mail:

Correspondence Information

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Correspondence Text

Topic Question 3:

If you truly wish to make this accessible the only option would be option 4. The grade would be too steep and dangerous for wheelchairs as well as many bike riders and walkers who have nay kind of mobility limitation.

I think you have a wonderful opportunity to provide all people access to an incredible part of the world. Why you would consider any other option than #4 is disappointing. As a retired occupational therapist I am well aware of the difficulties folks in wheelchairs have in fully accessing their environment. You have the chance to do something really brilliant and I hope you reconsider your choice.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 91

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization: North Kitsap Trails Association
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Poulsbo, WA 98370
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
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Correspondence Text

Topic Question 1:

Why is the ONPS disregarding the impacts to disabled, elderly and the young in their preferred alternative 3 ?

Topic Question 2:

Why is the alternative 3 preferred when ONPS knows that the ASHTO requirement then can not be met for ADA and that the already attained grant funding for this project will have to be returned, consequently, killing the entire shared use path project and the Cross State Trail link. it seems to be obvious that this is a blatant attempt by ONPS to stop the already half completed trail on the north side of Lake Crescent

Topic Question 3:

Where will ONPS come up with the money for alternative 3 ? ONPS does not have the funds to build such a trail, has not applied, has no plans to apply for them and by their actions in this process, never will.

Topic Question 4:

Why has ONPS not addressed the impacts of the Cross State Trail ? and the economic generation lost to the community.

Topic Question 5:

No they are not. They are not ASHTO or ADA compliant.

Topic Question 7:

I will be dead on highway 101 while trying to ride along the existing road shoulders...like some of my friends have.

Alternative 3 increases conflicts with opposing travelers on the path. Why is this not addressed ?

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 92

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information

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Correspondence Text

Topic Question 1:
No

Topic Question 2:
I think so

Topic Question 3:
No, but one of them is clearly the best choice.

Topic Question 4:
I don't think so.

Topic Question 5:
As far as I know.

Topic Question 6:
I believe it is.

Topic Question 7:
It would certainly make it more likely that I would use the park other than showing out-of-town visitors Hurricane Ridge!

I would opt for alternative #4 so that everyone can enjoy that beautiful area specially since there is already money to help with the project. This is a gorgeous area and everyone should have some spots where they can enjoy it without

having it be too steep for them to climb. A lot of older people find that steep grades are harder to maneuver than they used to be and it would be perfect for those who are wheel chair bound.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 93

Author Information

Keep Private: No
Name: John V. Woolley
Organization: OFCO
Organization Type: I - Unaffiliated Individual
Address: Sequim, WA 98382-7649
USA
E-mail:

Correspondence Information

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Date Sent: 10/20/2011 Date Received: 10/20/2011
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Correspondence Text

OFCO

Protecting and restoring our Olympic forest and aquatic ecosystems

October 20, 2011

Superintendent Karen Gustin

Olympic National Park

600 E. Park Ave.

Port Angeles, WA 98362

Spruce RR Trail Comments: Urban Values in a National Park

Olympic Forest Coalition's (OFCC) mission is to preserve, protect and restore public forest land and aquatic ecosystems on the Olympic Peninsula.

OFCC supports the "No Action" alternative. No action is most appropriate because the amount of development pressure being placed on Olympic National Park is considerably beyond the Park's original intent. Pressures from Clallam County to overdevelop our National Park are very disappointing.

Originally, OFCC had intended to endorse the position of the Olympic Park Associates, as it encouraged more reasonable development options based on ONP's GMP.

Now, OFCC supports taking more time to analyze the impact of enabling a second paved route along Lake Crescent. "No Action" just might provide the time to come to our senses.

Thank you,

John Woolley

President

██████████ Quilcene, WA 98376

www.olympicforest.org ? ██████████

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 94

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Sequim, WA 98382
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
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Correspondence Text

Topic Question 4:

Request you reconsider Alternative #4: The Clallam County Proposal as it best meets the Purpose and Need for taking action with fewer adverse impacts. See below

Both the GMP and LCMP call for a "universally accessible front country trail.." Visitor accessibility is called out as an objective of this project. ABA accessibility standards are required to be adhered to on all projects being developed using Federal funds. Adherence to these standards is consistent with the NPS and ONP mission which provides our parks in part for "the benefit, use and enjoyment of (ALL) the people...."

Handicap accessibility in ONP is severely limited primarily due to the rugged terrain. The Clallam County proposal provides an opportunity for the NPS to significantly increase handicap access in ONP by adherence to the ABA standards on this project. To do otherwise would seem to be inconsistent with both the ONP and NPS mission statements as well as contrary to the provisions of the ABA.

I therefore request you find a way to adopt the Clallam County proposal.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 95

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Orchard, WA 98367-7445
USA
E-mail: [REDACTED]

Correspondence Information

Status: New	Park Correspondence Log:
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Correspondence Text

Topic Question 3:

I did not see an alternative that would provide adequate safety and/or allow for use by those covered under ADA. AN 18% grade and a crossing at surface level across 4 lanes of highway traffic moving at 60 mph would prohibit many from using the trail. A six (6) foot width is not sufficient to allow safe passage of wheeled vehicles and equestrian riders. An eight (8) foot trail would seem to be the minimum safety requires. Please reconsider your proposals.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 96

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Lake Sutherland, WA
Lake Sutherland, WA 98363
USA
E-mail: [REDACTED]

Correspondence Information

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Correspondence Text

Topic Question 1:
Yes, How do you intend to access private lands. Negotiation or eminent domain.

Topic Question 2:
no

Topic Question 3:
no

Topic Question 4:
no

Topic Question 5:
do not know.

Topic Question 6:
You should try to control the ticks that are present in the brush alongside the current trail. Also brush should be cut back away from trail to lessen chance of contacts with the tick here. All it takes is one pregnant female tick brought back on clothes to infest the headquarters area of the park or other locations. You should post signs to warn of the ticks that can be found in the brush off trail.

Topic Question 7:
Don't know

Strongly prefer Alternative 4. This is one of the most beautiful trails along the lake with adequate parking. It is essentially level with only a few spots that can be made to work to comply with ADA requirements. This trail would add a tremendous accessible trail to people with handicaps and their helpers. Why you would not consider this alternative as the best would be a baffling decision by the park.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 97

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization: general public
Organization Type: I - Unaffiliated Individual
Address: Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
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Topic Question 1:
No

Topic Question 2:
Complete, but while the County Plan complies with the Americans with Disabilities Act, none of the parks plans do. Olympic National Park has over a million acres, much of it is inaccessible to everyone but the young and the very fit. The area we are talking about is a very small segment of this vast park. With all the environmental and historic concerns we are excluding the human element. Disabled persons matter too. It seems to me that with so much of the Olympic National Park inaccessible to the disabled it would only make sense to continue with the beautiful and well received trail system being built by Clallam and Jefferson Counties.

Topic Question 3:
All the ones that exclude segments of the general public due to disabilities. The narrow trail and steep grade options should be discarded as ill advised.

Topic Question 4:
Use common sense and use the Counties plan. It has been well received and much used in the areas that have been completed. It could also serve to take the bicycle traffic from the Highway 101 around the other side of Lake Crescent and make it safer for all.

Topic Question 5:
Yes, as stated above, the ADA .

Topic Question 6:

Probably, but again we are considering such a small area of a vast Olympic National Park, why not consider the people. We are part of the environment too.

Topic Question 7:

The Parks proposed plan considers all the plants, environment, and historic elements and doesn't consider the ADA or human element and how their very steep and narrow segments would exclude some of us from using areas of a well loved trail system.

As a member of the general public, I find it hard to believe the Olympic National Park would scrap a well thought out plan proposed by Clallam County because a very small area of the Park would need to be realigned to construct the trail which would comply to the Americans with Disabilities Act. It is hard to believe that environment and historical factors matter more than people do. The Park's Plans would be vastly different than the rest of the trail system throughout Clallam and Jefferson Counties and it would exclude a segment of the population from enjoying the Spruce Railroad segment of the Olympic Discovery Trail System.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 98

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED] Port Angeles, WA 98362
Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/20/2011 Date Received: 10/20/2011
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Notes:

Correspondence Text

Topic Question 1:

Yes. The description of the placement of the Olympic Discovery Trail at the top of Fairholme Hill in the SRRT EA is very confusing and unclear; particularly, the section entitled "Sol Duc Trail Development" at page 85 of Chapter 2 Alternatives. A large scale, small area map of the proposed placement of the "new trail segments", "spur trail", and "proposed interagency regional trail system", with such trails labeled, may have helped clarify the proposed placement of the Olympic Discovery Trail in that area.

Topic Question 2:

The information in the EA is not complete in this regard: many comments were received by ONP in the earlier public scoping of this project which recommended that the Olympic Discovery Trail, at the top of Fairholme Hill, should be routed through a tunnel, placed on the railroad grade, under Highway 101, to avoid the dangers of an at-grade crossing of the highway to users of the trail. Those comments were not even mentioned in the EA and were apparently entirely discounted.

Topic Question 3:

The placement of the trail at the top of Fairholme Hill, as described in the section entitled "Sol Duc Trail Development" at page 85 of Chapter 2 Alternatives will not work safely for users of the trail. Please see Comments, below.

The narrowing of the trail from 8 feet to 6 feet in width between the Lyre trailhead and Devil's Punchbowl, as proposed in the Park's preferred alternative, will not work safely for users of the trail because that width does not allow for safe passing clearance between trail users approaching each other from opposing directions on the trail.

Topic Question 4:

As intimated in my answer to Question 2 above, ONP did not consider the alternative of a tunnel at the top of Fairholme Hill to avoid a hazardous at-grade crossings of Highway 101 by trail users. A tunnel certainly meets the purpose of providing a safe crossing of Highway 101. Please see the letter of Superintendent Gustin to Mr. James Wesley of March 17, 2009, in which the Superintendent states, "[a] tunnel will provide a long term solution which is much safer than the currently proposed at-grade crossing", but expressed concerns about the cost of a tunnel. Because the EA does not discuss the use of a tunnel, one can only conclude that there was no evaluation of the safety that such a tunnel would provide or the weighting of that safety against the cost of a tunnel. Instead, the preferred alternative abruptly terminates the trail at the edge of the highway and restarts the trail again on the other side of the highway without providing any practical, safe means of crossing that highway.

Topic Question 5:

To place trail users in danger, either by failure to provide a safe crossing of Highway 101 at the top of Fairholme Hill, or by requiring users of the trail in the eastern part of the project, who must meet other on-coming users on a trail that does not provide enough width for safe clearance, does not comply with the trail developers' legal duty to provide a trail that is reasonably safe for those users.

National Park Service Director's Order 42, Accessibility for Visitors With Disabilities in NPS, provides in section II, "...one fundamental principle of this Director's Order is that the NPS will seek to provide the highest level of accessibility that is reasonable, and not simply provide the minimum level that is required by law. Consequently, managers are encouraged to exceed the requirements for visitor accessibility through innovative techniques and partnership whenever possible and reasonable". It appears that ONP has not applied NPS Director's Order 42 in its preferred alternative where the 18% grade of the proposed trail near the east end of this project will prevent access to a beautiful and level part of the trail to those who cannot negotiate the 18% grade, including those visitors who are wheelchair-bound; such visitors can be accomodated easily by the proposal of Clallam County, Alternative 4.

In Alternative 3, the proposed placement of the ODT at the top of Fairholme Hill, as described in the section entitled "Sol Duc Trail Development" at page 85 of Chapter 2 Alternatives, will result in a gap between "the Sol Duc and Lake Crescent trail segments". Through that gap runs Highway 101, which is a heavily traveled, multilane, high speed public highway with limited sight distances at that location. The proposed Alternative 3 placement of the trail will abandon trail users at the edge of that highway, in sight of the continuation of the trail just on the other side of the highway. The suggested solution to that abandonment by Alternative 3, that "the spur trail...would connect at an at-grade crossing of Highway 101 that is proposed for development by Clallam County west of the park" is not adequate. That suggested solution involves an indirect, circuitous, unpaved trail, with unnecessary elevation changes. Such a trail will not accommodate many trail users, such as road or touring bicycles and wheel chairs, and will discourage most other users from using that proposed solution. Many of those unaccommodated trail users, standing on the edge of the highway looking at the continuation of the trail just on the other side, will attempt dangerous at-grade crossings of the highway at that point. Unfortunately, by doing so, they will be in jeopardy of serious injury or death. I suggest that those responsible for such a dangerous gap in the trail will share in the liability for those injuries and deaths. That liability can be avoided by directly and safely connecting the two segments of the trail that are divided by Highway 101. Such a connection of the two segments of the trail can be made by construction of a tunnel under the highway. The cost of such a tunnel may be significant, but is cheap when compared with the injuries and deaths that could result from the negligent placement of the trail by Alternative 3.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 99

Author Information

Keep Private: Yes
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Port Angeles, WA 98362
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/20/2011 Date Received: 10/20/2011
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Notes:

Correspondence Text

Topic Question 2:
If the trail is not ADA compliant, it should not be built, period.

Topic Question 3:
If the trail is not ADA compliant, it should not be built, period.

Topic Question 4:
If the trail is not ADA compliant, it should not be built, period.

Topic Question 7:
If the trail is not ADA compliant, it should not be built, period.

If the trail is not ADA compliant, it should not be built, period.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 100

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Tucson, AZ 85710
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/20/2011 Date Received: 10/20/2011
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Notes:

Correspondence Text

Topic Question 1:

The delineation of short term and long term perspectives is inefficient; it is best to approach this with a long term view. In terms of investment, I would encourage Olympic National Park to measure twice and cut once.

Topic Question 2:

Clallam County has revised their alternative, addressing the concerns of the NPS.

Topic Question 3:

A trail grade of 18 percent along any length would not work for wheelchairs. A trail width of six feet is not safe for this use.

Topic Question 4:

A manually-operated, solar-powered or volunteer crewed ferry, such as the Local Motion ferry along the Island Line in Vermont? This could be operated as an alternative on weekends when the trail is likely to get the most use.

Topic Question 5:

No, it does not meet ADA standards and does not meet minimum paved width safety standards endorsed by AASHTO.

Topic Question 6:

No, a short term trail is not a solution and creates additional impact both environmentally and politically.

Topic Question 7:

I would recommend the route to friends touring the Olympic Peninsula only if the trail met the minimum standards.

Of course, the mission of the National Park Service is to preserve and protect for future generations, however, that mission was written at a time that failed to value non-motorized transportation. Ironically, the Spruce Railroad Trail's history is based on transportation. It's development needs to embrace changing societal needs for sensible transportation alternatives.

Olympic National Park encompasses natural resources, but it also is supported by a diverse community of stakeholders. The Olympic Discovery Trail is a community asset and will benefit Olympic National Park visitors as well as Olympic Discovery Trail users.

I encourage the NPS to work with Clallam County in building the trail to ADA, ABA and state safety standards.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 101

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Eugene, OR 97404
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/20/2011 Date Received: 10/20/2011
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Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I urge you to adopt "Alternative 4: Rebuild trail to include wheelchair access".

This trail seems like the ideal place to have an ADA accessible trail. With available funding in place, it is a no-brainer. Many or most other areas of the park would be difficult or impossible to upgrade to achieve wheelchair access, this trail is very possible to improve to this standard providing access to not just wheelchairs, but also many people who would otherwise have very limited accessibility to the park's beautiful and historical features.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 102

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Tacoma, WA 98406
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/20/2011 Date Received: 10/20/2011
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Correspondence Text

Topic Question 1:
no

Topic Question 2:
complete enough

Topic Question 3:
I believe alternative number 4 is the clear choice to help people "Experience your America". Since funds are available, I think it makes sense to make this wonderful project available to the largest number of people, and to include people of all capabilities. I look forward to experiencing it.
Bill Roes

As noted above- my wife and I would push for alternative # 4 which allows for the broadest use of this trail, not limiting it to people who are able to negotiate the steep slope proposed in # 3. As an aging baby boomer, I look forward to enjoying Washington State, and I hope that I'll be able to access this particular part of the Olympic Discovery Trail.
Bill Roes

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 103

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
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Correspondence Text

Topic Question 3:

I understand the dilemma the Park may have re: historic place, but this is where leadership is needed - to get this right. It is surprising that one arm of the government (ONP) can't make the ADA-accessible trail work along Lake Crescent when so many funds and local effort have made this trail work so well. Figure out a way to make the trail handicapped accessible - and the width of the rest of the trail.

This is making the Park administration look pretty weak. Good leadership looks at all the issues, uses judgment and does what is best.

Topic Question 7:

I know a young woman, now deceased who made a study of accessibility for handicapped people, as she was one. She is well known in this community. For her sake and for the sake of all who have disabilities, I want to think of her when I walk and cycle the Spruce RR segment of the ODT.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 104

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98363
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/20/2011 Date Received: 10/20/2011
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Correspondence Text

Topic Question 1:

There are no maps showing the eastern rise of the trail, for any alternatives. This appears to be one of the most controversial parts of the plan, yet there are no maps to compare alternative routes (as there are on the west at the Sol Duc Road.) The information provided is inadequate to evaluate the plans. The trail should simply stay on the railroad grade until it reaches the present trailhead. Nothing in your maps tells why it can't do that. (In conversations with people who claim to know, there appears to be a private parcel in the way, though the title is not clear, and the stakes are high enough on this project to warrant buying them out of an easement, with whatever mitigation it would take to placate them.

Topic Question 2:

Only opinions

Topic Question 3:

No, they all have trade-offs.

Topic Question 4:

It appears that no effort was made to find a way to limit pavement width, and still secure the grant funding the county road dept offers. An argument should be attempted that this is a unique project, with unique mitigations to the ASHTO standards, that unpaved width will be available for passing.

What is needed is a synthesis of the Park's preferred alternative, and the County's proposal. The grade should follow the county's alignment on the east end, if it truly cannot be put directly on the railroad grade. The pavement width should follow the Park's specifications: not to exceed 6 feet. The total grade width should equal the county's proposal, so that the unpaved portion is as wide as the paved portion. This would make the trail feel much less like a

road through the wilderness than the new 8' part the county already did, while allowing a grade that is accessible to wheelchairs, and conducive to bicycling. The unpaved portion is too small in both designs. Most foot traffic will be attracted to an unpaved trail, especially runners. It also seems to me that the unpaved part, being slower, should be on the Lake side, with the faster, paved traffic against the slope.

Topic Question 5:

'Accessibility' takes a beating on the Park's preferred plan, since the east end grade is too steep. It may be within the letter of the law, but clearly not the spirit.

Topic Question 6:

That's hard: I believe that the biggest single impact will be the elimination of the sense of wilderness along this corridor. That may be an acceptable impact, given the quality of the experience newly available to impaired users, but it's a significant impact. I don't think acres of disturbance, or cubic yards of excavation really matter in the long run, it's the establishment of this corridor as a significantly paved thoroughfare that will have long lasting effects. Other than abandoning the project, the best that can be done is to limit the pavement width, and enhance the unpaved portion.

Topic Question 7:

If the East Beach Road corridor becomes suitable for bikes, then it will become a serious destination, and route to places west. But until the East Beach Road corridor is more bike-friendly, it will mostly make the Spruce Railway Trail less attractive as a place to enjoy nature. Already, on a running-biking trip with my son on the existing unpaved trail, and the newly paved 8' wide part, he swore he'd never go running on the paved part again, and that if they paved the lake part, he wouldn't run on any of it. The pavement was too joint-jarring, and the unpaved part was cluttered with forest debris and limbs to the point that it wasn't really available as a running surface, repeatedly forcing him back onto the pavement. As a cyclist, I could have easily done with a 6 foot pavement width, and passed oncoming bikes or wheelchairs easily. It felt like overkill, especially when compared with Camp David Jr Road, which appears to be narrower, and less paved.

What I want to see is the best of both plans:

1. Limit pavement to 6 feet width, except in rare and unique cases. There is already one road around the lake, we don't need two. We need a multi-use facility that retains some primitive wilderness feel. The new county trail section to the west doesn't feel like a trail, it feels like a road: total overkill for this location.
2. Limit grade to 6%, so that wheelchairs can make it. Preferably, negotiate an arrangement with any property owners in the way so that the trail can stay substantially on the original RR grade.
3. Increase width of the unpaved side of the trail to at least 6 feet, so that there is room for a horse and runner to pass on it, and so it is a significant enough part of the trail that it will get suitable maintenance and use, and not just look like a wide shoulder. This is the other side to the issue addressed above in point #1
4. Open the tunnels, as per the county's proposal.
5. Use the Park's alignment on the west end: better to follow Sol Duc Hot Springs Road in a direct manner than to wander all over the forest. Better yet, negotiate to secure an easement on the original grade, that's all forest land, so there is no one to intrude on.
6. Don't develop an orphan trail: to be used as a true alternative bike route around the lake, it must address non-motorized access along East Beach Road. Hwy 112 corridor to the waterline road only solves part of the access issue

- people will come from the Elwha and Hurricane Ridge by Hwy 101, and need safe access to the trail in order to continue around the Lake.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 105

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Denver, CO 80203
USA
E-mail: [REDACTED]

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 10/21/2011	Date Received: 10/21/2011
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Correspondence Text

If agreements can be reached with the private land owner and the National Park Service, I am in favor of Option 4. In this particular instance, it is feasible to accommodate those with physical challenges so they too may fully enjoy the area. It is my understanding that Clallam County has secured funding to defray the additional cost of this option.

I encourage the Park Service to give Option 4 thorough review/consideration. It would be a shame to pass up the opportunity to make this recreation area accessible to all. In so many other cases, when it comes to hiking trails, it is not possible to do so.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 106

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address: Port Angeles, WA 98362
USA
E-mail:

Correspondence Information

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Correspondence Text

Topic Question 1:
No

Topic Question 2:
No. The goal of the project seems clear but the last two alternatives, and especially the last one, alt 4, seem to include construction which impacts the park resource far more then is indicated in the purpose of the project.

Topic Question 3:
As I wrote above, alt 4 seems to include construction which impacts the park resource far more then is necessary. When I went out and walked the trail after reading the document, most of the development occurs in areas already or previously "developed"; i.e. on the rail grade or existing trail. The proposed new cut across the hillside is not needed and clearly impacts resources beyond a level of benefit from the trail.

Topic Question 5:
No. Alt 4 clearly does NOT protect park resources. Isn't that what the NPS does? Once you cut the trees, they are gone, gone, gone.

Topic Question 6:
It seems reasonable.

Topic Question 7:
My use would be best served by NO DEVELOPMENT. I use the trail as is. If you develop and pave it, it is unlikely I will use it ever again. If you just pave the first part (alt 2 ?) I might still use it, certainly from the east end.

I don't understand all the excitement. Since reading the document and going onto several areas of the ODT throughout the county, all of the letters and especially the county web site make no sense.

Many sections of the trail DO NOT currently meet access rules, that is clear. The new section at the west end of PA is dirt, no matter how the county tries to spin it into some fancy dirt. It's dirt. So why, if they are so happy with their dirt trail in PA, do they go off on their web site about more asphalt? If dirt is good in town where there will be lots of use, why not out there by the lake where a dirt trail makes more sense?

I ride a bike. No way would I ever go all the way around to this trail to avoid Hwy 101 along Lake Crescent. No way. And even more, riding on East Beach Road would be worse than riding 101.

I respect the rights of disabled users. How many disabled users would do a through walk as compared to users who would use a part of the trail, including access to the punchbowl? I didn't count how many miles, but there are, what, 6 miles already paved and I don't see a rush of people out to that. Such access has to be compared to the loss of trees and cutting down of the hillside in alt 4.

Opening the tunnels could be cool. It would be a good way to visualize history.

There is not enough in the EA about placing those storyboards to tell the history of the railroad.

I like the development of better parking areas. That is needed, especially at the west end of the trail.

The trail should be placed on a grade which can be maintained. That should be clear from the current trail. All along the waterfront the trail is constantly covered with mud from failures. Why build a new trail which will likely fail when there is a stable grade there? Didn't one part of the trail out there already fail? There is a big landslide path. Can the NPS afford to build something you will just have to keep spending money to fix, year after year?

I have been at public meetings about this project, both by the NPS and the county. You are not telling the same story as the county. Who is right? I tried to go by just what I read in the EA but there is a real problem with other information, like on the county web site where it seems like the NPS did something wrong?

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 107

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Port Angeles, WA 98362
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/21/2011 Date Received: 10/21/2011
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Notes:

Correspondence Text

Topic Question 1:

No, but I am confused by what I read in the paper. I thought the NPS was NOT going to make the trail accessible. Is the park going to make it open to wheelchairs?

Topic Question 2:

I don't know. I couldn't find anything about how many people use the trail now. How many people does the park think will use the trail after it is rebuilt? The parking lots still look pretty small. Will there be enough room? When I hike the trail now sometimes I have to park on the side of the road. Is that okay?

Topic Question 3:

I like the trail now. I really don't like the idea of hiking of a wide road-like trail with bikes zooming by me all the time. Will there be a speed limit?

Topic Question 4:

I like the first alternative. The trail is great the way it is now. Use the money to fix the muddy spots if you want but leave the rest of the trail the way it is. If you turn it into a road I will go somewhere else.

Topic Question 5:

I don't know. The paper says the parks plan isn't ADA.

Topic Question 6:

I don't know. The paper says it isn't.

Topic Question 7:

It depends. I use the trail now. It gets busy sometimes, but not so much that its a problem. If the trail gets really developed and lots more people show up it will be less appealing. I might go somewhere else, but this trail is my favorite close to home. My next favorite trail for a good day hike is out to the coast at Ozette, but that is a long drive.

My last comment is about the cost. This project looks really expensive. If the park does not have money to build the trail now and expects volunteers to keep it up then why are you proposing to fix something that isnt broken???

Use what money and volunteers you have to take care of the trails you have now.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 108

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Port Angeles, WA 98363
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
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Notes:

Correspondence Text

Topic Question 1:

No. It is clear that ONP does not put ADA standards for accessibility to the Spruce Railroad Trail as a priority.

Topic Question 2:

Yes, I believe public input should be highly considered with the needs of the community a priority. All people are apart of the egosystem.

Topic Question 3:

We have a terrific opportunity to make the Spruce Railroad Trail accessible to people who are challenged in wheelchairs or elderly that are otherwise not be able to navigate trails in ONP. (There is only Madison Falls Trail at this time).

Topic Question 4:

I understand that accessibility would require changes to the grade, removing and shoring up hillside, removing trees. This kind of impact is being done currently in the removal of the 2 dams on the Elwha River. I recognize that it is necessary for the greater good of restoring the river. I believe we can do the same on the Spruce Railroad Trail and the ecosystem will support the altered terrain, for the greater good of accessibility to human occupants.

Topic Question 5:

No, I believe ONP is not taking ADA standards seriously.

Topic Question 6:

I believe you are accurate and complete, but like any debate ONP is siding on the least amount of environmental impact without consideration of the people who will visit the park as part of the environment.

Topic Question 7:

I am a physical therapist and work with people who are physically challenged in the Port Angeles community. I find it embarrassing that ONP has only 1 trail, and very short at Madison Falls, other than that people physically challenged can access the park only at the parking lots. We need to do better. We have this great opportunity to do so RIGHT now with the Spruce Railroad Trail. Remember no one has 'immunity' from life's circumstances where you may find yourself or other family member physically challenged.

Please use this opportunity to make the Spruce Railroad Trail accessible by ADA standards for use by people who are physically challenged. We are an aging demographic in Port Angeles, and have a large population of developmentally delayed people, and families with children who are in wheelchairs who are extremely limited in where they can access ONP trails. I have hiked and backpacked countless miles in ONP and not done all the trails by any means. This park is a treasure of grand proportions. It is the least we can do to open up an area that would otherwise be inaccessible to a growing part of our society.

Again, please work together with the Trails Coalition and the funds that have been allocated to meet the ADA standards for the Spruce Railroad Trail.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 109

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Port Angeles, WA 98362
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/21/2011 Date Received: 10/21/2011
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Notes:

Correspondence Text

Topic Question 1:
If it isn't ADA compliant don't do it.

Topic Question 2:
If it isn't ADA compliant don't do it.

Topic Question 3:
If it isn't ADA compliant don't do it.

Topic Question 4:
Alternative 4 to make it ADA compliant.

Topic Question 5:
If it isn't ADA compliant don't do it.

Topic Question 6:
If it isn't ADA compliant don't it.

Topic Question 7:
If it isn't ADA compliant don't do it.

Select Alternative 4 and make the trail ADA compliant.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 110

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent: 10/21/2011	Date Received: 10/21/2011
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Notes:	

Correspondence Text

As the parent of an 8 year old daughter who must use a power wheelchair to get around, I beg you to rebuild the trail according to ADA standards. This rebuild will allow her and other differently abled people to enjoy this portion of the trail. The funding is available and it is the right thing to do. Thank you.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 111

Author Information

Keep Private: No
Name: Ernie J. Bulter
Organization: NW Chapter paralyzed Veterans of America
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Burien, WA 98166
Burien, WA 98166
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/21/2011 Date Received: 10/21/2011
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Correspondence Text

Topic Question 1:

It is unclear to this organization why a 10 mile stretch of this project is being made not accessible to the disabled community and the Disabled Veterans we represent. It also unclear as to why public funding has been used in construction of this trail project, which clearly stipulated that ADA adherence is mandatory when using public funding. Making 80 percent of the trail accessible but not this final portion when plans for accessibility have been proposed seems to disregard ADA requirements. Our organization cannot support any project in state where ADA is not followed and where the disabled community will not have access to state lands.

Topic Question 3:

The National Parks is already facing law suits in California's Olympic National Park for failing to meet ADA standard. Why are willing to repeat that mistake and face the same type of litigation when Clallam County has presented a cost efficient alternative plan that would provide for complete accessibility and meet all ADA standards and not affect access for any citizen in the State of WA

Topic Question 4:

The Clallam County Proposal that fully explains how to best meet the ADA requirements and provide complete access for all our citizens including the disabled Veteran population can be found at [http://websrv7.callam.net/forms/upload/2011-09-27 1640 SpruceRailroadTrailLakeCrescentPublicComment.pdf](http://websrv7.callam.net/forms/upload/2011-09-27%201640%20SpruceRailroadTrailLakeCrescentPublicComment.pdf)
This power point fully explains the alternative and has few adverse impacts while allowing for complete ADA compliance.

Topic Question 5:

We argue that not making the entire trail accessible is inconsistent with legal mandates. When public funds are being

used to provide new access to public lands is is mandatory to adhere to ADA law.

Topic Question 7:

By not making the 10 mile stretch of the 'Spruce Railroad Trail' ADA compliant you eliminate the complete use of the trail to the disabled community. You eliminate the use of Handcycles (something members of our Veteran organization are quite active with) and wheelchairs to this scenic and historical section of the trail and prevent the disabled community complete end ot end access to the trail system planned.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 112

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98363
USA
E-mail: [REDACTED]

Correspondence Information

Status: New	Park Correspondence Log:
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Notes:	

Correspondence Text

The Discovery Trail would be a great asset to Clallam County, as well as Olympic National Park. It would be a great visitor draw, and it would keep bicyclists away from the dangerous south shore road on Highway 101.

The National Park seems to be nitpicking when they want a six foot trail, as opposed to an eight foot width. There would be no environmental impact on an existing roadbed by adding two feet. The roadbed itself is not a natural formation within the Park.

Also, for a government agency to deny handicap access seems at odds with its own policy. ADA requires handicap access wherever possible on public lands.

What will be preserved will be the railroad route, not the rocks, which have no significant historical value. They were undoubtedly brought in from another location. To claim the ballast has historical significance seems really silly, even for a government agency.

I would hope that the Park would reconsider, and decide to work with the county. In my opinion, the Park has an obligation, whenever possible, to be a good neighbor to the surrounding counties. Please don't hold up an important project just because you can. Thank you.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 113

Author Information

Keep Private: Yes
Name:
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Clallam Bay, WA 98326
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
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Correspondence Text

Topic Question 1:

In considering the northern reach of the trail proposal, it is unclear the impact to private property along with the issues those affected landowners would have (perceived by NPC and demonstrated by the landowners themselves). In addition, it is unclear if an attempt at mitigating any such issues and those that are both barriers to their agreement and/or their suggestions.

Topic Question 2:

The plan doesn't appear to address whether the zoning of this trail segment would be classified as front country or backcountry; or a special zoning would be established. I would advocate this trail segment be classified as front country and applicable recreational activities be extended to their fullest.

Topic Question 4:

Fewer Adverse Impacts to the user group! Too much emphasis on protecting a particular resource and not considering that disabled citizens are a resource also.

Topic Question 5:

Section 5 of the enabling ONP legislation is not addressed for those landowners in the affected region. "Full use and enjoyment".

Topic Question 6:

No, and this is the highlight of the comments I bring forward: Proposed wilderness designation adjacent to the trail sections have not been explained/demonstrated. The impacts of minimum tool to maintain the trail, to include upslope stabilization that falls within the wilderness zoning (or identifying where that ACTUAL deliniation line occurs, to include upslope slide events and the mitigation of that potential, and the understanding of the

administrative section of the 1988 wilderness legislation that exempts the affects of activities in non-wilderness designated zones (such as the trail segment) creating an impact on adjacent wilderness (such as soundscape). The proposed wilderness desination is a concern that needs to be evaluted in detail for the long term sustainability of the project and trail.

Topic Question 7:

Being a disabled military veteran I am still functional in life; however, as those debilitating issues limit my functionality in the future my ability to access and enjoy the Park becomes even more limiting. Where I use to go as a youth and not thinking twice about using trail systems classified as primitive, it's beyond just growing older...it's the ever increasing affects of those disabilities that will be the limiting factor of my use of the resource. I need this as my future, I need an accessable trail that doesn't have signigicant "grade" percentages.

I advocate the intent of the ADA be applied in the northern reach of the trail, the intent to allow as much opportunities for those with disabilities even at the expense of the protection of implied resource as alternative 3 places as a threshold that cannot be passed. I disagree that with 95% of the park classified as wilderness, and there be clear evidence the other 5% is managed in a willderness fashion as the rule of thumb, the owners of this park are the resource too and thus must be protected. To determine what's acceptable to all users and resource needs, it is important for the plan to expand the available options on this access to disabled users. But also be cognitive of private property and it's willingness/objection that may directly impose on their rights.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 114

Author Information

Keep Private: No
Name: Diane D. Schostak
Organization: Olympic Peninsula Visitor Bureau
Organization Type: I - Unaffiliated Individual
Address: [REDACTED] Port Angeles, WA 98362
Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/21/2011 Date Received: 10/21/2011
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Correspondence Text

As a regional tourism marketing organization responsible for drawing visitors to our area, the Olympic Peninsula Visitor Bureau supports the Clallam County Alternative 4 for the Spruce Railroad Trail Expansion. This alternative will continue the trail as it is envisioned and planned by the community in the safest way with reasonable access by all users.

As most of us know, the current path for bicycles along 101 is unsatisfactory and not very safe. Once a trail is constructed that provides an alternate route to the south shore/101 route, we believe that the use of this trail will increase greatly. Given bicycle traffic today on 101, and comparing the potential increases for use with a beautiful wide alternative route away from motor traffic, it won't take long for word to get out about this wonderful new asset for trail-using travelers to our region. We plan to promote it in all our materials, websites and through all marketing channels!

It would be a travesty to have a section of the Discovery Trail that narrowed and became steep inside the National Park. The message users would get would be one of "someone would not play well in the making of this trail", and that someone is the Park Service. Why? What is being saved or accomplished by holding back on this project? What is being gained by not joining with stakeholders to ensure a consistent corridor.

On the other hand, so much could be lost with funding tied to a trail standard.

Alternative 3 does not make sense to us as a tourism organization, nor will it make sense to users for years to come. The Park Service will forever have a monument to the world of its lack of cooperation on this grassroots project that spans counties, cities, tribal lands, and public lands. Generations will see the proof that, of all those involved, only the National Park Service could not see the vision of a trail style that is safe and accessible to all.

Please allow Alternative 4 to be the preferred choice for this potential world-class trail.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 115

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98362
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/21/2011 Date Received: 10/21/2011
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Notes:

Correspondence Text

Topic Question 2:

The Purpose and Need section of the document has changed significantly from the Cooperative Agreement with the County, the Public Scoping, and the Park Fact Sheet... all of which state that "the purpose is to provide a universally accessible trail along the entire trail length" to the SRRT EA purpose, which is to provide a multi-use trail -- dropping the original purpose to make the entire trail accessible. The CBA goals don't even include the word "accessible". This has fundamentally altered the entire EA process.

Topic Question 3:

Consider what would happen if you reversed the segment labels, with "A" starting at the Lyre River. From the perspective of someone who would need a universally acceptable trail, this would seem ridiculous, especially since you are putting an accessible toilet there. The fact that the National Park Service, an agency that is striving to be a progressive leader, is the agency responsible for preventing access along the entire Discovery Trails length is embarrassing. One of the park goals is to develop some trails to become part of a regional trail system. The park's preferred alternative eliminates this possibility for disabled visitors. The SRRT is a front country, not a wilderness trail.

Topic Question 4:

Stick to the original Purpose and Need Statements that were used throughout the public process. In the end, the impact of the current preferred alternative on disabled visitors is very significant.

Seriously consider the County's revised proposal, or at the very least, make section D accessible while keeping the trail to the NPS preferred width.

Topic Question 5:

A fundamental principle of NPS Directors Order #44 on Accessibility is that "the NPS will seek to provide the highest level of accessibility that is reasonable, and not simply provide the minimum level that is required by law". Managers are encouraged to exceed the requirements for visitor accessibility through innovative techniques and partnerships whenever possible and reasonable". Of the over 600 miles of trail in Olympic National Park, less than one meets the current guidelines as an accessible trail. ONP has many trails that allow a visitor to hike from one side of the park to another, or from one beach to another. Disabled visitors do not currently have that alternative. Designing the SRRT so that it is entirely accessible creates the possibility of an unparalleled experience for people with disabilities.

Topic Question 7:

I would use the trail much more often if it was accessible from the Lyre River trailhead. I also believe that the same is true for many disabled visitors. The number of visitors with disabilities will be increasing dramatically over the next 20 years and everyone at some point in their life will have mobility impairments. Please make the entire trail accessible... the goal that was stated from the beginning of the EA process.

Clallam County has already negotiated with inholders to allow SRRT access. Many of the existing trails in the park cross, or begin in, land that is not owned by the National Park Service. Please be creative.

Thank you

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 116

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98362
Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information

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Correspondence Text

Topic Question 5:

NO. The only alternative that meets the requirements of the Americans with Disabilities Act (ADA) is Alternative No. 4. The railroad grade is not steep. The fact that the National Park Service wants to preserve the ballast rocks and boulders is rather inconsequential when for a short distance, the trail will be completely impassible to anyone with any mobility deficits. The trail should be full width and of a moderate grade (like the railroad) so that all can enjoy its beauty. The Park has hundreds of thousands of acres that are inaccessible to all but the young and extremely fit. The Park should be available to all the citizens, particularly close to populated areas. The Counties of Clallam and Jefferson have cooperated in building a fantastic trail system that will eventually stretch from Port Townsend to the Pacific Ocean. How sad that the Park is considering putting an impediment to this trail for no other reason than to preserve some ballast boulders.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 117

Author Information

Keep Private: No
Name: [REDACTED]
Organization: Peninsula Trails Coalition
Organization Type: I - Unaffiliated Individual
Address: Port Angeles, WA 98363
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
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Notes:

Correspondence Text

As a retired USGS employee, I appreciate the sustained effort the Park has put into this detailed and complicated issue of the upgrade of the SRRT. I have complete confidence in the personal and professional integrity of the employees working on this EA. I know it is painful to put forward your best effort and receive negative, mistrustful reaction. I appreciate the opportunity for public comment afforded by the EA process, but I am concerned that it does not allow the kind of collaborative, reiterative effort that is clearly required to arrive at the most satisfactory solution to upgrading the trail. This upgrade MUST accommodate not only the minimal disturbance to the natural and cultural attributes of the area, but also the safety and access needs of the ODT shared use path community.

Please spare no effort to find a way to this end. The Park's Preferred Alternative has many fine qualities. Among them is neither a safe paved width in all sections, nor a wheelchair accessible grade in section D. I know others have made the width arguments using the commonly accepted AASHTO shared use path standards, which call for 10 feet of pavement but will under some circumstances accept a bare minimum of 8 feet of paved path for bi-directionally traveling cyclists, walkers and wheelchair users to safely pass each other. Your 4' of gravel stock trail I believe to be adequate, and essential for this traditional user group of the SRRT. All of these groups are part of the Olympic Discovery Trail constituency, and the SRRT itself is along the routing of a 126-mile-long project long recognized by ONP.

I am aware the Park and the County have disagreed over the methods used to build Phase one, both in the way the railbed was graded and the railroad profile severely altered (among other issues perhaps). It is time for everyone to be adults, set aside past arguments and errors of judgment, and work collaboratively to come up with a better plan than the Preferred Alternative for these critical 4 miles from the current paving to the Lyre River end of the trail.

I recall the comment made at the public meeting on Sept 21, concerning the part of Section D that has a stretch of trail too steep to be compliant with ADA/ABA standards for wheelchair use. She was in a wheelchair herself and

pointed out that not only would there be returning war vets in wheelchairs who are virtually shut out of ONP, but also the aging local population who will have rising numbers of disabled among them. I cannot believe the standards the Park feels called to uphold really intend to preclude wheelchair use from virtually all of a premier American National Park. If tipping the balance away from preservation of a few dozen second and third growth trees, towards greater ease of public access of a part of the park already supporting a highway for heavens's sake, is impossible in ONP's mind, perhaps higher authorities within the NPS and Congress should be consulted for guidance.

The County is trying hard to get on board with ONP's construction methods and railgrade and tree preservation vision. Preserving the feel and profile of the railgrade does not preclude overall widening the tread on top, per Russell Holter of the Washington Dept. of Archaeology and Historic Preservation. I urge ONP to get the best mediator available, sit down with the County and all ONP's data and all the County's data and see if there is SOME way to endorse 8' paved plus 4' gravel, ADA/ABA compliant grade, over sections A, B, C and D. Look at it this way, after this, construction of the ODT will continue elsewhere and the County and ONP will be out of each other's hair about it.

This isn't about winning or losing. It's about doing the right thing for the greatest overall benefit. If the EA process will not support the iterative, collaborative process that will yield the best SRRT upgrade plan for all natural, cultural and human parties, again perhaps higher authorities should be consulted.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 118

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address:
edmonds, WA 98026
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
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Correspondence Text

Topic Question 3:

If the trail was too narrow (6 feet) It would NOT be safe to be shared with bicycles, horses, walkers and those physically disabled (unstable) whether in wheelchairs or not.

Topic Question 5:

The ADA criteria should be met as written in law. Make this trail accessible to all: the elderly, physically disabled and especially our disabled veterans! Keep it within safe limits with a 8-10 foot width.

Topic Question 7:

I feel proposal #4 is the only safe comfortable construction with only a 4% grade that I could use.

Having been raised in the National Parks (Mt. Rainier 11 months, Yosemite 15 years and Olympic three years) I am always eager to return several times yearly to enjoy the wonderful outdoor activities and environment. The past 30 years I have suffered the declining physical challenges of Multiple Sclerosis and am not able to access the beloved destinations that used to be easily accessed. Slight modifications often make the difference of a successful trip or not. Please consider proposal #4 for those of us who live with disabilities but can still be active within safe and comfortable limits. We too deserve the right to enjoy our beautiful National Parks!!
Thank you for your consideration of my input. Stephen Tyng Mather was the topic of my 8th grade graduation speech (our heros) while living in Yosemite. Part of his vision for the National Park Service was for all to be able to enjoy the the many TREASURES that were set

aside. I look forward to being able to continue to explore and enjoy Olympic National Park!

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 119

Author Information

Keep Private: Yes
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Sequim, WA 98382
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
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Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

Topic Question 1:
No

Topic Question 2:
Yes. No.

Topic Question 3:
I believe that Alternative 3 will not work as well as Alternative 4 in meeting most of the stated goals for the project. There is essentially no practical or discernible environmental difference between paving 6 feet of path vs. 8 feet of path.

Topic Question 4:
No. This resource should be converted to maximum user friendly non motorized usage. If the railroad was still in operation, this discussion would not be happening. The biggest environmental impact took place when the rail bed was put in originally. A quietly used pathway, whether 6 or 8 feet wide is orders of magnitude less impacting than an operating railway on the area.

Topic Question 5:
It is most likely in line with legal and government requirements.

Topic Question 6:
Perhaps it is, but does it serve the public's best interest though?

Topic Question 7:

A 6 foot path will place the users at greater risk of conflict than would an 8 foot path.

Thank you for the thorough study.

While there are many objectives listed under Goals 1 and 2, I believe that meeting the meeting the specific objectives under Visitor Access and Visitor Experience is of paramount importance. The access and enjoyment by the visitors should be consideration number 1 and maximizing those aspects has no significant impact on meeting the objectives listed under Goal 1.

Alternative 3 limits the enjoyment of the visitors by limiting the hard surface to 6' thereby compromising the first objective under Visitor Access, namely providing safe pedestrian and bicycle access. The 8' width alternative is much safer for those visitors. The 6' limitation also makes it more likely to have conflicts between different type of users, namely pedestrians and cyclists or roller bladers and even wheel chair users.

The original rail bed was blazed through the wilderness and defined an overall historic width, including drainage ditch. There is no rational to limit the width of the resurfacing work outlined in the current proposal an an imposed 6 feet plus 4 feet for gravel, when it can just as simply include and 8 foot paved path, with the clearing of the drainage ditch for the equestrian pathway. I believe, on balance, this is the best approach for the public.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 120

Author Information

Keep Private: No
Name: N/A N/A
Organization:
Organization Type: I - Unaffiliated Individual
Address:
Port Angeles, WA 98362
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
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Correspondence Text

Topic Question 1:

I understand that the NPS has been given certain mandates, but I disagree with the way the information has been presented as the underlying logic is not clear. The improvements to the Spruce Railroad Trail and the issue of the building of the new trail in the Sol Duc area of the park seem to be two entirely distinct matters. My preferred option list would be entirely different if the new trail involving the new Sol Duc Trail was presented as an entirely different proposal. There is no articulation of the connection between the proposals, which is very confusing for those of us not involved in the planning process.

Topic Question 2:

I believe that the information is currently accurate. However, current use information, statistics, and evaluations of current trail conditions is necessary to fully evaluate the proposals and is not present. For example, how many roller bladers currently use the ODT outside the main segments near Port Angeles and Sequim? How many are expected to use this segment? How many miles of ADA accessible trail is there currently in the park? What is the cost of all of these proposals, especially rebuilding the tunnels? I know that in the planning process, there is going to be a vocal minority that is going to try to get their voice heard (bikers, those involved in equestrian activities, and those with disabilities have historically been the most vocal) while the typical user does not comment. It is for this reason that usage statistics and realistic projections are necessary. I doubt there are many roller bladers using the trail. I know many people that would like to be able to landboard on the ODT, but nothing in the proposal addresses that or the clearing of trees to facilitate their kite flying. Further, the specifics of improvements such as picnic tables and trash receptacles on the trail is not

Topic Question 3:

I do not believe there is an alternative that is not physically feasible. Economic feasibility is an entirely different matter. I believe Alternative 1 is the most likely to work as it has been proven to work, although the Park could

improve its maintenance methods. After that, Alternative 2 will also work easily. The trail in segment A is already in fantastic condition and the effort needed to improve it is minimal.

Topic Question 4:

I believe a proposal that improves the bypass around the tunnels where the trail narrows and becomes steep and including a ramp over the bridge at the Punch Bowl with no other changes would have been ideal. I think simple improvements in maintenance would allow the trail to be used by bikers with hybrid road/mountain bikes; others could use other ways around the lake. I believe that considering the Sol Duc expansion and new trail building as an entirely separate issue should have been done. The Sol Duc proposal included is entirely different from alternative 1 to alternative 2 to alternative 3, which makes it tough to compare the actual alternatives solely based on the impact to the existing trail. Why was not connected the County Trail and the new trail in the Sol Duc considered in Alternative 2? The proposals also all fail to take into account the user base issue I have earlier mentioned. The proposal all fails to take into account the health impacts that paving will have on users. Asphalt has been shown in numerous studies to have a detrimental impact to bones (stress fractures, etc.) in running and hiking. As someone who has used the trail sometimes five days per week because of the unpaved nature of the trail (one of the few public unpaved trails that is in good enough condition to run on), this is concerning. What about an option that is unpaved, firm, stable and slip-resistant? The guidelines say that this is fine and is much preferable to any runner or hiker. The beauty of the current trail is the packed dirt surface is easy to run on. Gravel, even when compacted, is very difficult to run on for any serious athlete in training.

Topic Question 5:

No comment

Topic Question 6:

No comment

Topic Question 7:

Under Alternative 1, my use would not change. I have sometimes used the trail up to five days per week because of the ideal surface for running. Under Alternative 2, I would still use the trail, but would probably limit the use of the trail section that will be paved (Section A). I estimate my use at peak times would decline by 50%. Under alternatives 3 and 4, my use would probably decline by 90%. I would not enjoy a paved trail that would be continually crowded. Each of the proposals that include paving the existing trail would decrease my usage. I would support building the additional trail.

This is an important matter to me. I am a huge fan of the Spruce Railroad Trail and have used it up to five times per week, usually for running. The trail is ideal because it is packed dirt, which is better for the body than pavement or gravel, and is in a majestic setting. It is unique among trails because of its base. I feel that the trail is also unique because it offers the opportunity to both run and mountain bike on a natural surface. Besides Alternative 1, each of the proposals will destroy some of the surface that necessary for my enjoyment of the trail. Even if the trail has a gravel shoulder, this is less than ideal as gravel is not easy to run on and I, as a runner, have been frequently hit by road bikers on the ODT. I have never had a problem on the Spruce RRT because its current nature demands the biker to pay attention, something a paved trail would not.

My preference:

Alternative 1

Alternative 2

Alternative 3

Alternative 4

I would prefer the new trail portions to be built unpaved and connected.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 121

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98363
USA
E-mail:

Correspondence Information

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Notes:

Correspondence Text

The spruce railroad trail should be made ADA accessible. we have lots of trails that are not available to the handicapped. We need more that do allow everyone to enjoy nature. The Spruce Railroad trail would be perfect. Thank you. [REDACTED]

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 122

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: not provided
not provided, WA NA
USA
E-mail: [REDACTED]

Correspondence Information

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Contains Request(s): No Type: E-mail
Notes:

Correspondence Text

Dear Superintendent Karen Gustin, I support the SRRT expansion with either the park alterate 3 or County 4. With the county plan 4 the trail is a vital link to the discovery trail that allows for use with AASHTO guidelines which would make the access not steep for a person with disabilities if a private owner will allow trail to cross through property. County 4 allows for more use. I walked the trail on almost a daily basis this summer with a nearby private property owner. We saw that parking lot needs expansion as well as handicapped parking with a turnaround. In the future I would take my grandchildren bicycling on the trail as I did with my sons but it is not safe enough to do so now. I also recommend an underpass where the trail crosses the highway to Solduc on 101. When the crossing was first looked at by the county the official stood looking for traffic. He stated he could count a safe distance between vehicles. With increased logging trucks and trucks carrying chips for biomass there will be more traffic on 101. I would like to be able to ride my bike safely all the way to Sol Duc Hot Springs for lunch from Lyre River or ride the continuation of the ODT without having to worry about a highway crossing, especially with grandchildren.

Sincerely, [REDACTED]

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 123

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Seattle, WA 98119
USA
E-mail:

Correspondence Information

Status: New	Park Correspondence Log:
Date Sent:	Date Received: 11/02/2011
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Contains Request(s): No	Type: Other
Notes:	

Correspondence Text

Request to be added to SRRT mailing list

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 124

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: NA
NA, WA NA
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
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Notes:

Correspondence Text

Re: Comments on Spruce Railroad Trail Expansion and Improvement EA

Dear Superintendent Gustin:

I have two concerns. First, how will wildlife be protected?
During drier weather, the big cats are known to head down to Crescent Lake. In past years there have been attacks on hikers and bikers. Rare instances, but they happen. Since more people will be encouraged to enter wildlife habitat, I'd like to insure the wildlife have some protection and are not killed because they have encounters with humans.

Second, the ODT organization has used pesticides on the paved trails because they do not want to pull weeds. Will the use of pesticides be banned on the trail running through the park along the Crescent Lake waterfront? They should be.


Thank you,

[REDACTED]

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 125

Author Information

Keep Private: No
Name: [REDACTED]
Organization: Peninsula Trails Coalition  Member
Organization Type: H - Recreational Groups
Address: [REDACTED]
Sequim, WA 98382
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 10/22/2011 Date Received: 10/22/2011
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Notes:

Correspondence Text

Question 1:

Are any actions described in the Alternatives unclear?

Your plan and assessment is very clear and comprehensive.

Question 2:

Is the information complete and accurate? Do you have additional information that should be considered?

A major consideration in the design of non-motorized, multi-user transportation Corridors(shared use paths, for short)such as ODT, is selecting a tread width which results in a safe operating environment for all the supported users. You propose a 6' preferred operating width, but do not address why you believe that will provide a safe condition for all users. Tens of thousands of miles of these types of trails have been built in the US in the past 30 years or so, most either built or funded (or both) by State DOT's and the Federal DOT. Safety experience on these trails has led to widening width standards to 10', with rare exceptions to 8' for very low volume usage. These Standards are embedded in WashDOT shared use path standards, and supported by AASHTO guidelines for use throughout the US. This experience base says your 6' preference is to narrow to be safe. I could find no place in your SRRT assessment where you spoke to this issue. Since ONP has no experience with safety on shared use paths, it behooves you to assess your design in light of the experience with these kind of trails nationally. In doing so, you need to recognize that this trail will carry, in addition to the normal park visitor traffic, the through traffic from longer distance ODT users.

Question 3:

Are there any particular reasons why a particular alternative or action would or would not work?

Referring to the missing information referred to above, I believe there is a high probability that, over time and with

increasing use, you will develop an unacceptable safety record with your preferred alternative.

Question 4:

Is there an alternative or action that we did not consider that would better meet the Purpose and Need for taking action while resulting in fewer adverse impacts?

Referring to my responses to Question 2 & 3 above, there is an alternative that has been used many times on ODT. Basically, you feel that you can provide no more than 10' of total tread width without excessive environmental and historical impact. Similar conditions have arisen frequently during the development of ODT, and the decision has always been to say that the corridor is too narrow to support both trail users and horses, and the horse track has been eliminated. Of the 41.7 miles of ODT completed to date, 20.1 miles (48%) have no horse track for this reason, and 21.6 miles have an adjacent horse track. Of the 20.1 miles, 8 miles are within city limits, and 12.1 miles are in the county. Width constraints include terrain constraints, affordable bridge widths, ROW availability, and local congestion. Lacking a convincing argument for the safety of a 6' tread width, it appears you have opted to retain a safe track for horses at the expense of an unsafe track for all other users.

Question 5:

Are the actions considered in this environmental analysis consistent with applicable legal mandates?

I am not familiar with the legal mandates you face with regard to safety.

Question 6:

Is the analysis of environmental impacts accurate and complete?

I have no special expertise in environmental assessment, but compared to others I have read, it is quite convincing. It is certainly true that a national park should have a higher standard for environmental protection.

Question 7:

How would the particular proposal discussed in the EA affect you and your use of the park?

I am very appreciative of ONP's strong support of the region's initiative to make ODT a world class trail and a major asset for the North Olympic Peninsula. Fix that one little problem and I will be ecstatic!

Comments:

I understand your rejection of the original county plan to correct the 18 degree slope in section D due to excessive environmental impact. I strongly encourage you to take a close look at the county's revised proposal to see if it reduces the impact enough to justify going to the lower slope route. Our disabled friends would be much better served with access from East Beach to this beautiful trail segment. And again, Thanks for all you have done in support of ODT.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 126

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: NA
NA, WA NA
USA
E-mail: [REDACTED]

Correspondence Information

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Correspondence Text

I am asking that this email be added as an addendum to my original public input submission of 10/17/11.

As concerned as ONP is over cultural and natural resource protection in its plan for development of the Olympic Discovery/Spruce Railroad Trail at Lake Crescent, I am unaware of any attempt on the part of current ONP staff to become familiar with the actual recent historical facts (the past 40 years) surrounding the development of Section D of the SRRT as it has been designated in the current EA.

Section D was first scouted by ONP personnel the summer of 1971 for possible inclusion into the Park's 600 mile trail system. I was a party to that effort as a seasonal member of the trail crew. Later, as ONP's work programs director for the Young Adult Conservation Corps, I was directly involved in the decision to build this trail and the challenge of how to do it while bypassing the private inholdings adjacent to the Lyre River Trailhead. I was once again reminded of that challenge while disappointingly following the park's newly-flagged route yesterday. The original route I flagged, as used today, was governed by two temporary factors. For the time being, the first factor was to stay off privately-held ground until such future time when the park eventually acquired the inheld lots enabling either trail construction on the rail grade (road) below, or at least rerouting the traverse of the private ground bypass down-slope from its current location; a route some 50' in elevation

lower on the hillside from its current location, much closer to the top of the slope originally cut for the rail bed in 1916. The second factor was hand versus mechanized labor. The existence of a previously cut logging track, or cat track, upslope from an obvious permanent route, yet roughly running parallel in the direction we needed to build the new route became very attractive. Though it was heavily overgrown with brush, and represented more elevation gain than was necessary for future hikers, I temporarily selected it based upon the fact that the hand labor involved in building new trail through even recently-scarred/logged-over reproduction (digging out stumps and root wads with pulaskis and shovels) was something I chose to avoid; the cat track offering a preferable choice for the moment; the moment being the dead of winter. (Note: Like ONP's current WCC Program, our 18-24 year old enrollees worked trail projects year-round.) Without significant loss of labor or duplication of route design through future realignment, the cat track could have been (and was intended to be) readily abandoned following establishment of a more user-friendly route relocated down slope and constructed during dryer months. This plan, as all others involving YACC trail construction was approved by ONP's Trails Foreman. The steep layout of the "18%" leg of this new bypass route was once again arrived at after giving weight to an economy of hand labor. This grade represented the shortest, most direct route from the cat track back down to the rail grade at lakeside. No trees were cut even though there was little to no consideration given to second growth protection from hand construction. Further, there was no consideration given to ADA access (what was that?), the soon-to-be-born idea of a non-motorized transportation corridor requiring 4% maximum grade, or ANY cultural resource significance for a variety of reasons. Realignment of trail routes (reroutes) were common place back then, based upon necessity and common sense with on-site decisions being made by knowledgeable trail crew personnel, probably just like they are today. The temperate rainforest "jungle" of the Olympic Peninsula's valley floors quickly covered old abandoned trail tracks, unlike the long term impacts of abandoned rail beds. My career path at ONP soon veered away from leading youth programs and their attendant trail projects. Unfortunately, realignment of this inholder bypass never resurfaced as a project priority within the 600 mile system. The existing 18% grade precluded public accessibility to the SRRT for some very important user groups whose exclusion was later meant to be rectified by identification in the park's general management plan ("universal accesability") on one of the most heavily used trails in the park. So it is with consternation and disappointment that I see ONP planning to halt the evolution of this trail by permanently eliminating complete non-motorized user groups from the SRRT access at the Lyre River trailhead at Lake Crescent based upon cultural and natural resource protection. The lesson to me, as I've heard pass your own lips is "temporary too easily and often becomes permanent". With that lesson in mind I urge you to reconsider elimination of the ODT as a non-motorized transportation corridor through ONP, a mistake to be regretted as indicated by the conventional wisdom expressed in the flood of negative public input you have received to the Park's Section D proposal.

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 127

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: NA
Forks, WA NA
USA
E-mail: [REDACTED]

Correspondence Information

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Correspondence Text

I do not think anyone is paying attention. There are half page articles in our newspaper daily quoting the County and Trails Coalition accusing the Olympic National Park of not caring about the handicapped, and demanding the Spruce Trail be paved 8 foot wide and flattened. They are not interested in the handicapped they are interested in building the ODT and this is where they decided it was going! They will not take no for an answer. Why is there no one speaking out in defense of the park? I cannot even get a letter to the editor published , as if that would do any good anyway. People don't want this. But they are afraid of being accused of being against the ADA. I love this trail. I use this trail. It needs to be 8 foot so there is passing room? What crowds are they expecting? It will be like the rest of the ODT, ugly, broken, closed half the time for repairs. Why is this allowed to happen?

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 128

Author Information

Keep Private: No
Name: Al LePage
Organization: National Coast Trail Association Official Rep.
Organization Type: H - Recreational Groups
Address: PO Box 11045
Portland, OR 97211
USA
E-mail: coasttrails@spiretech.com

Correspondence Information

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Correspondence Text

Karen Gustin, Superintendent
Olympic National Park, National Park Service
Olympic National Park Headquarters
600 E. Park Avenue, Port Angeles, Washington 98632-9798
Hello:

The National Coast Trail Association's vision is the "National Coast Trail," a land and water-based coastal trail system around the United States providing opportunities to experience the natural, historic and cultural resources along its length. Our priority goal focuses on America's 1,800-mile "West Coast Trail," a hiking trail from Cape Flattery, WA to the Mexican border in California. The "Washington Coast Trail" represents the northern 175-mile section of the West Coast Trail, and the Olympic Coastal Strip, a very important segment through Olympic National Park's western edge. Also, the vision and development of the Olympic Discovery Trail is another recreational opportunity since such inland trails that connect outwards to our trail system immediately along coastal areas are also within our purposes to promote and develop. Therefore, this letter represents the National Coast Trail Association's comments and input on the proposed expansion of the Spruce Railroad Trail segment of the Olympic Discovery Trail, and specifically on the Spruce Railroad Trail Expansion and Improvement Environmental Assessment (SRRT EA) which was released on September 21, 2011. The comments provided focus on our organization's goals of trail development and enhancement relative to the "Olympic Discovery Trail" within and adjacent to the boundaries of Olympic National Park relative to Lake Crescent.

The National Coast Trail Association is a conservation-oriented organization in addition to our focus in providing quality recreational opportunities with access for as many non-motorized users as possible, as our original letter of input for this project clearly indicated. Therefore, our organization must also address not only how to provide quality recreational experiences for visitors, but also how to best protect natural and cultural resources within the trail

corridor itself. This means we also address questions and find answers towards best serving both people and wildlife that state and national parks need to address.

Providing recreational opportunities optimally not only needs to be safe and accommodate the greatest number of people, but also consider ? especially given the limited resources available at this time ? how to enhance opportunities for project funding.

Therefore, given the significance of the proposed trail expansion and enhancement, first, we both appreciate and support the preferred alternative, however, second, offer only one important modification or adjustment that would not only continue to serve both natural/cultural resource protection and provide for visitor experience but also apparently has the potential in assisting the agency and/or others in terms of qualifying for potential funding. Specifically, relative to providing for visitor and trail user safety (and also potentially for more effective/enhanced risk management and protection for the National Park Service), and to better serve those visitors with limited mobility (for example, people who need to use walking sticks or wheelchairs) our recommendation is to increase the width of the hardened trail surface being proposed in the preferred alternative.

In accordance with the minimum standards of the American Association of State Highway and Transportation Officials (AASHTO) contained within their Guide for the Development of Bicycle Facilities (1999) relative to shared use paths and paved surfaces if a shared path is one-directional, then a 6 foot width is the minimum standard for the paved/hardened surface. However, their recommended width for a two-directional shared use paved/hardened path in most situations is actually 10 feet. NOTE: An 8 foot width is the minimum standard for two-directional usage, but only when bicycle and pedestrian usage is expected to be low, path alignments allow needed passing opportunities, and maintenance vehicle loading would not break down pathway edges. Therefore our recommendation is that a hardened trail surface width of either 8 or 10 feet (based upon expected shared pathway usage) appears to be more appropriate for this project based on ASSHTO standards to effectively provide both for recreational user needs and safety. Also, relative to mitigating additional environmental impacts that would potentially occur by developing the 10 foot width most likely needed though, would be to make exceptions at various points along the trail such that natural or cultural resources that are either especially significant or require protection would be left intact by occasionally decreasing the paved/hardened pathway width to 8 feet, and making the associated modifications needed relative to provide effective "traffic control" in such relatively rare instances.

We appreciate Olympic National Park's efforts towards making the dream of the Olympic Discovery Trail a reality, this opportunity to provide our comments and input, and for your consideration of our proposed modification.

Al LePage, Executive Director

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 129

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: NA
NA, WA NA
USA
E-mail: [REDACTED]

Correspondence Information

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Correspondence Text

Subject: The Spruce Railroad Trail Expansion and Improvement EA

Without the benefit of reliable internet service, I am responding to your call for public input to the above named project from memory, having read Olympic National Park's (ONP) preferred alternative in the EA, and Clallam County's alternative proposal some 20 days ago.

Until this issuance of the Park's EA on this project, the primary reason for developing this project has remained consistent over the past 40 years as both park personnel and interested members of the public have moved the project forward. That reason lies squarely on the issue of non-motorized public safety. As the only viable through-route alternative to the geographical choke point of US HWY 101 at Lake Crescent on the North Olympic Peninsula, the Spruce Railroad grade on the north side of Lake Crescent has been identified through various stages of planning as a safe non-motorized transportation corridor. All other non-motorized traffic running the gamut from wheelchair bound visitors to various bicycle/pedestrian/equestrian users will be safely accommodated under this central transportation category. The key to that successful outcome has always been the application of ASHTO design standards, most recently acclaimed by the vast majority of public respondents following construction of the initial 6 mile segment of the Olympic Discovery Trail (ODT) through ONP from the east end of the North Shore or Camp David Jr. Road to the top of Fairholm Hill at Lake Crescent.

With the issuance of this EA and its' preferred third alternative, ONP has abandoned the primary focus of public safety in favor of natural/cultural resource protection. Abandonment of ASHTO design standards amounting to reduction of pavement width from 8 down to 6 feet and the incorporation of grades up to and including 18% not only compromise public safety on this popular (highly congested) segment of the ODT, but summarily eliminate use by those wheelchair bound individuals covered by the Americans with Disabilities Act (ADA); a user group that should be given top priority access to the flat, scenic viewscapes afforded from the lakeside rail grade as approached

from the Lyre River parking lot. To not include consideration of this user group in the released preferred alternative is absolutely inexcusable.

Cultural resource protection resulting in reduced pavement width in preferred alternative three is based upon archeological findings produced by ONP staff. Not being an archeologist, I am nonetheless inclined to find the results of Clallam County's research endeavors to carry far more weight and validity based upon the extent of research conducted, actual rail bed width recorded in historical photos, eyewitness accounts of Spruce Railroad construction, and the publication of those findings to the interested public at this time. Natural resource protection on previously impacted, wilderness exempt rail bed is definitely within the purview of ONP's responsibility to "preserve and protect" the second growth reproduction timber and water/air quality in an ADA compliant project design, but not at the expense of needlessly compromising the viability of a safe non-motorized user-friendly product. To do so is to ignore the past 40 years of ONP/community effort primarily driven by concern for public safety.

The project design at and near the top of Fairholm Hill is exceedingly unclear as written in the EA. A blown-up map of the proposal would have been of great service to the reviewing public. After previously receiving heavy public input in favor of a safe tunnel crossing under dangerous US HWY 101 on the historic rail bed, disappointingly, no mention of a tunnel was made in any of the EA's 4 alternatives, even after current consideration of using publicly-owned rights of way. ONP will remain liable for serious injury and death as non-motorized ODT users attempt an at-grade crossing of the 150', 5 lane width of 60+ mph traffic, to continue on the ODT across the highway. However, I do applaud the use of the ONP interpretive kiosk parking lot near the US HWY 101 intersection on the Solduc Hot Springs Rd. as an ODT trailhead if a rail grade tunnel crossing is ever built. This would provide a far safer trailhead alternative to Clallam County's foolish proposal for a trailhead on the north shoulder pullout on US HWY 101 at the top of Fairholm Hill. Separating non-motorized from high speed motorized traffic must consistently remain a primary design element.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 130

Author Information

Keep Private: No
Name: Russ Veenema
Organization: Port Angeles Regional Chamber of Commerce Official Rep.
Organization Type: O - Civic Groups
Address: NA
Port Angeles, WA 98362
USA
E-mail: russ@portangeles.org

Correspondence Information

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Correspondence Text

Comments regarding the Spruce Railroad Section of the Olympic Discovery Trail:

The chamber is on record in support of the development and expansion of the Olympic Discovery Trail, and we continue to do our best to market this terrific asset as a tourism destination.

Over the past couple of months information regarding the expansion of the trail to the west using a section called the Spruce Railroad Trail has been in the news. I have to admit that I was under the impression the notification for public meetings and the comment period was purely a formality and was just the due diligence and paperwork that needed to be completed for the trail to be built. I now have learned that some of the main trail partners are opposed to the trail due to it not being the same width as other sections of the ODT and also not being ADA acceptable. This does seem like a serious issue and on behalf of the chamber we encourage the Olympic National Park, Clallam County and the Trails Coalition to try and work out the differences. Since this is a new part of the trail which is currently in the design phase it would seem to make sense to try and build this section of the trail to also being ADA compliant.

Thank you for allowing us to comment.

Russ Veenema
Executive Director
Port Angeles Regional Chamber of Commerce

Port Angeles: The Authentic Northwest.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 131

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: NA
NA, WA NA
USA
E-mail:

Correspondence Information

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Correspondence Text

First of all I am appalled that you have put this up for comment to the public with erroneous or incomplete information. You haven't gotten your facts about the trail, grades, history, or the Park's own requirements.

When forced to make a decision of the given alternatives I would have to say #3 would be best IF:

- 1) It is made with a minimum 10 to 12' width to allow users ample passing room.
- 2) Has an inside gravel shoulder at least 3' wide for horses.
- 3) There is NO section with an 18 degree slope (rediculous!)
- 4) Is made ADA accessible. To not is inexcusable and cause for legal repercussion.
- 5) Provide access for ambulance and fire vehicles.

If you had done your homework you would see that most of these items are the Park's historical/legal requirements, and in fact the Park is presently being sued in another state for not complying with their own rules (which will certainly occur here if you insist on your present preferred alternative). All of the requirements have SAFETY as the main consideration (which also complies with the federal funding requirements for the ODT).

Please remember where the money for your paycheck comes from. This project and the rest of the ODT is for the people and is highly successful in the remainder of Clallam and other Counties. It is used and will be used by locals and tourists and provides a valuable attraction to our area. All of it could be usable for all trail users no matter their disabilities (motorized vehicles excluded).

This small section of land, really, is no skin off the teeth of the National Park (although the teeth seem to be turning into fangs). The park should really employ an educated individual that is familiar with this whole project (ODT included) and our area, not someone with an office in another state, to make these decisions.

ONP should be ashamed of delaying this project as long as it has and should actually jump at the opportunity to have such a successful trail system going through this small (but important) section of National Park land.

Just my opinion,

[REDACTED]

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 132

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98362
USA
E-mail:

Correspondence Information

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Correspondence Text

To: ONP

At this point, I'm not sure why you are asking for public comment. You have made it pretty clear that you are set on one of your options. Clallam County revised their option and you didn't include the revision in your presentation. I would suggest that you go paint a 6 ft wide path on your parking lot. Have 2 people climb onto some bikes and attempt to pass each other from behind as to overtake and approaching in opposite directions.

We seem to be experiencing more federal gov't imposing what they want upon the people and not giving the people what they are asking for. Once again, we see the gov't wasting time and money, coming up w/their own set of standards and not using the already provided nationally accepted AASHTO standards.

Even 8' of paved surface is safer than 6' of surface. Do you have 4' of trail surface for horses in other sections of the national park? I can tell you, no. You have single track and the "area" for the horse is brushed at about 4'. I've seen the pack of mules, fully loaded, successfully make it up the Elwha for trail work. So why not pave 8' and reduce the horse section on the path to 2' but keep the trail brushed to 4' width?

I would LOVE to see al those cyclists who come to ride around the peninsula, NOT have to ride on the very dangerous south side of the lake on hwy 101.


Sincerely,

[REDACTED]

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 133

Author Information

Keep Private: No
Name: Kent Myers
Organization: City of Port Angeles  Official Rep.
Organization Type: T - Town or City Government
Address: 321 East Fifth Street
Port Angeles, WA 98362
USA
E-mail: citymanager@cityofpa.us

Correspondence Information

Status: New Park Correspondence Log:
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Correspondence Text

Dear Karen,

As you know, the City of Port Angeles values our working relationship with the Olympic National Park (ONP) and we work with ONP on a large number of projects and activities that are mutually beneficial.

One of the current projects that has required close coordination and cooperation is the development of the Olympic Discovery Trail. For over 20 years, the City has worked with local Tribes, the Trails Coalition, Clallam County, ONP, and numerous other jurisdictions to construct this 140-mile long trail that will be a very significant asset to our community. Over 40 miles of the Trail have been constructed in our County and many of our residents are using the trail for their daily health and recreation activities. We appreciate the fact that ONP has worked in a very cooperative manner with the other jurisdictions on the past accomplishments with Trail design and construction.

Currently your office is preparing an Environmental Assessment of Phase II of the Spruce Trails Extension Project Phase II of the Olympic Discovery Trail, which is located within Olympic National Park. Our City Council recently considered the current design proposed for this section of trail and voted 6 - 0 to support Clallam County in their efforts to have the design plans revised. Our concerns include the fact that the design is not consistent with other portions of the Trail. The narrower width of the Trail that the National Park Service is proposing could pose some health and safety dangers with the variety of different types of users of the Trail that we are already experiencing. In addition, your design does not meet ADA standards that we have ensured are met with other portions of the Trail. The disabled population is very important to our City and we want to insure that their needs are accommodated with all public facilities.

While we understand and appreciate the fact that this is a wilderness area, the revisions proposed by the County

should not result in major alterations of the general wilderness appearance of this area of the National Park.

We appreciate your consideration of these comments and we hope that your office will reconsider the current design plans for this portion of Olympic Discovery Trail.

Sincerely,
Kent Myers
City Manager

Cc City Council; Clallam County Administrator, Jim Jones

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 134

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information

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Correspondence Text

I have read both the SRRT Environmental Assessment and the revised Alternative 4 that is on the Clallam County website. My goal was to understand all of the options for the construction of the trail, taking into consideration environmental impact, safety, and availability of the trail to the greatest number of users.

When considering trail width, I researched the safety standards for shared-use paths. Every source that I was able to find, which included Departments of Transportation for each state, the American Association of State Highway and Transportation Officials, and a variety of bicycling and rail-to-trail organizations, stated that for a shared-use path to be considered safe, the width should be 10 feet. In some cases, an 8 foot width could be considered acceptable. Based on this information, and considering that the SRRT will likely have less traffic than other parts of the ODT (so would qualify for the 8 foot exemption), it seems clear that the SRRT project should be 8 feet in width to ensure safety.

Another important consideration is the inclusion or exclusion of user groups. One user group that I thought about when reading the EA is equestrians. While I was sure that the best trail width for horse users is 4 feet, I was unsure if the horse trail would be best located adjacent to the paved trail, or separated from it. I asked a number of horse users about this. They looked at the drawings for both Alternative 3 and 4 of the EA, and most of the people that I talked to said that a 4 foot horse trail at the same level as the main trail (which is shown in Alternative 3) would be preferable to having the horse trail in what essentially could be called a ditch (as shown in Alternative 4). A few horse users said that either situation would work fine. Based on this feedback, the best alignment is for the horse trail to be 4 feet in width and located adjacent to the main trail on the railroad grade. So this would result in an 8 foot paved trail, with a 2 foot shoulder (for safety) on one side and a 4 foot width for horse use on the opposite side.

The other user group that I was concerned with was handicapped users and other users that might benefit from a trail that is fairly level and clear of obstacles, such as older people, young children, or families with children in strollers.

Trail Section D described in Alternative 3 excludes these users by including an extended 18% grade. I find this unacceptable, especially when there is a way (as shown in revised alternative 4 on county website) that will work and also have little additional environmental impact (see my further comments below). There are hundreds of miles of backcountry primitive hiking trails in Olympic National Park, but very few trails available for reduced-capability park visitors. making the SRRT fully accessible would be a HUGE accomplishment for the park - and put ONP in the running for one of the most handicap friendly national parks, which I hope would set a good example for other national parks.

Finally, I am very concerned with protection of natural resources, and want to be sure that construction of this trail will not significantly impact the Lake Crescent environment. When looking at the environmental factors, it struck me that the main factors that were evaluated are cubic yards of material excavated and number of trees removed. Because my comments are most closely in line with the revised Alternative 4 on the Callam County website, and the revised alternative was not evaluated in the EA, I used the county estimate of these factors, and calculated the difference in cubic yards of excavation and tree removal between those two plans. The revised Alternative 4 excavates only 3500 cubic yards of additional material, and removed only 66 additional trees sized 11" DBH or smaller. It was also interesting to me that the county plan removes 0 larger trees, but the ONP preferred alternative removes 11 large trees.

There seems to be no significant difference in the environmental impacts in the revised alternative 4 (vs. preferred alternative 3), but the payoffs of the additional excavation and tree removal are HUGE. This small amount of additional excavation and tree removal allows for the trail to be accessible to all users, and allows for the trail width to be considered safe. I now that the National Park Service considers the safety of the national park users to be of utmost importance. It seems clear to me that there is a very small price to pay to achieve a universally acknowledged safety standard.

My final thought is that this trail is not just an ONP trail, but rather it is part of a regional trail system called the Olympic Discovery Trail, which also will become part of a state trail system. Because this is part of a larger transportation system, it is crucial that the SRRT be built to the appropriate safety and user standards. The SRRT will get non-motorized travelers off of Hwy 101, they should not be put onto an unsafe alternative on the SRRT. Please consider changing to universally accepted construction standards, especially since it can be done with little additional environmental impact over the preferred alternative.

Thank you for your consideration,


Port Angeles, WA

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 135

Author Information

Keep Private: No

Name: Jeff Chapman

Organization: Buckhorn Range Chapter, Back Country Horsemen of Washington
Rep.



Official

Organization Type: H - Recreational Groups

Address: [REDACTED]
Chimacum, WA 98325
USA

E-mail:

Correspondence Information

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Correspondence Text

RE: Spruce Railroad Trail Expansion and Improvement Environmental Assessment

Thank you for your effort investigating the potential to open the Spruce Railroad Trail to expanded recreation use in order to address the continuation of the multi-user recreation and shared use path trail known as the Olympic Discovery Trail. We appreciate the opportunity to comment on this complex matter of trail enhancements along the Spruce Railroad Trail as well as new trail construction in the Sol Duc Road area.

The Back Country Horsemen of Washington (BCHW) is considered the leading equestrian group in the state that represents pack stock and saddle horse users on public land trail systems throughout Washington. We are a founding member and current leader of the national organization, the Backcountry Horsemen of America. We have a history of working with both the Interior and Agriculture (USFS) Departments with regards to land management policies, laws, and maintenance concerns.

The Buckhorn Range Chapter of BCHW is based in Jefferson County, Washington. We are a supporting organization for the construction and maintenance of both the Pacific Northwest National Scenic Trail (PNNST) and the Olympic Discovery Trail (ODT). Equestrian use is an established official activity on both of these trails, and is intended to be supported by and provided for by the associated agencies and government entities including both Jefferson and Clallam Counties.

The original intent of the ODT is to support all non-motorized user groups including equestrians, hikers, mountain bikers, and road bicyclists. In many areas the ODT serves primarily as a community connector while elsewhere it is a non-motorized transportation corridor. Historic support for this trail from county residents including the conveyance

of lands was due to the multi-user aspects of the trail and not the specific needs of any one group. In Jefferson County, the trail is unpaved gravel, 10' wide, ADA accessible/rated, and grant supported. Knowing this, we are confused by much of the public information being expressed by groups insisting on a wide paved surface for the sections across the Olympic National Park. It does not match our experience with the granting authorities or the multi-user and ADA criteria for the trail. So being, we will only address the equestrian elements.

We support the provisions in Preferred Alternative 3 for a 4' wide gravel path that will continue the rights of current user groups to use the trail. These users include horses, hikers, and mountain bikers. As traditional users of the Spruce Railroad Trail, it is unacceptable to provide any solution that does not accommodate or would eliminate existing users.

We do object to the accessibility argument, particularly with the Sol Duc section in Alternative 2, that a gravel trail cannot meet both the needs of people with disabilities and equestrians. This is not a problem in Jefferson County where a gravel trail (also being the same ODT) provides for both. In fact, the predominant users with disabilities are more likely to be found on horseback than in wheelchairs.

We do not feel that the primary use of the Spruce Railroad Trail, as it exists, is as a bicycle trail, which is stated in the EA. We do however recognize though that for road bicyclists to get off the US 101 corridor around Lake Crescent, they are going to need extra incentives that go beyond what a gravel surface provides. As long as equestrian passage is still provided on a non-paved section, we do not object to efforts to accommodate other user groups on this or other portions of the Olympic Discovery Trail.

Thank you for your consideration of our comments.

Jeff Chapman
Director, Buckhorn Range Chapter
Back Country Horsemen of Washington

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 136

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98362
USA

E-mail:

Correspondence Information

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Correspondence Text

Dear Superintendent Gustin:

Thank you for the opportunity to comment on the proposed Spruce Railroad Trail Improvement Project. The Spruce Railroad has long been a much neglected recreational asset within the Park. The proposed plans to improve the Spruce Trail along Lake Crescent will provide an opportunity for many to enjoy the magnificent beauty of the Lake free from the vehicular intrusions of US 101.

Of the four alternatives presented, Alternative 4 best meets the stated objectives of the project and has the added advantage of costing \$400,000 less than Alternative 3, the NPS preferred alternative. While Alternative 3 is far preferable to Alternatives 1 and 2, it does not achieve the following stated objectives as well as Alternative 4: Safe pedestrian and bicycle access through Lake Crescent; Reduce conflicts between non-motorized and motorized uses; Design to facilitate ongoing management and maintenance.

Since the SRRT is to be used by pedestrians, bicyclists and horses, the potential for conflict between these three users exists. Providing the greatest amount of separation between these users will mitigate conflicts and provide the greatest potential for safe use by all. Alternative 4 provides an 8 ft paved surface for bicycles and pedestrians and a 4 ft gravel surfaced flat bottom ditch for horses. This configuration provides the greatest potential for safety and reduced conflicts. Alternative 3, with 6 ft of paved trail and 4 ft of gravel shoulder, confines all users to a much narrower corridor greatly increasing the potential for conflict and reducing safety for all. Alternative 4 is designed according to AASHTO guidelines for bicycle facilities, whereas Alternative 3, is an NPS developed design. The Alternative 4 design standard has already been implemented within ONP by Clallam County with the recent completion of the ODT Phase 1. Continuation of the same design standard on the SRRT in the Lyre River and Sol Duc segments makes sense not only from the users perspective but also from a construction and maintenance perspective. Costs to build according to the Alternative 4 standard are known from experience building the ODT

Phase 1. It is unknown where the Alternative 3 design standard has actually been built. The Alternative 3 design standard certainly has not been built in the Lake Crescent area. The costs to construct to the Alternative 3 design standard locally, therefore, are not known to the precision that they are known for Alternative 4. It can be certain that Alternative 3 suffers from a cost disadvantage imposed by an arbitrarily narrow work corridor. Alternative 4 is not so burdened and consequently is able to offer not only a much lower construction cost than Alternative 3, but also accessible grades in Segment D which Alternative 3 does not offer. The claims made in Appendix D, Scenery and Visual Resources section regarding the adverse affects of Alternative 4 vegetation removal in Segment D are entirely subjective. There is no old growth timber along the alignment of the SRRT. Removing some second growth trees in Segment D to provide an accessible grade would also provide improved growing conditions for the natural under story vegetation present. That is not necessarily a bad thing.

Again in Appendix D, Park Operation and Safety. The claim is made that both Alternatives 3 and 4 would, by virtue of their existence, impose additional maintenance and operational burdens of ONP. This seems a reasonable assumption were trail maintenance a priority for the Park. However, there is no evidence that it is. One need only look at ODT Phase 1 or any other trail in the Park for that matter to see that trail maintenance is not a top priority. Of the two, Alternative 4 would better facilitate ease of maintenance and operation. The wider paved, all-weather surface would be easier to maintain and would better allow maintenance vehicles access than the narrower paved trail with unpaved shoulder provided by Alternative 3.

The claim is made in Chapter 2, Part 2, Page 113 that Alternatives 3 and 4 would displace some current users who prefer a less developed trail experience. This is another unsubstantiated pronouncement by NPS staff offered up as fact. However, assuming for the moment that the claim is true, we can take comfort in the knowledge that there are hundreds of miles of deteriorating trails in ONP for this small, but hardy group to enjoy their wilderness experience.

In summary, I am pleased that NPS is planning to improve the SRRT. Whether Alternative 3 or 4 is ultimately selected, either one would be much better than what exists presently. Either alternative, if implemented, would be extremely popular. However, for the reasons stated above, Alternative 4 best meets the stated objectives of the project and is the better value.

Sincerely,
[REDACTED]

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 137

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Forks, WA 98331
USA
E-mail:

Correspondence Information

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Correspondence Text

Dear Superintendent Gustin,

The purpose of this memo is to comment on your Lake Crescent EA.


I am pleased with the appearance Olympic National Park supports 80% of the Callam County proposal and that now opening both tunnels is appropriate. I also like your proposed link from the Sol Duc Hot Springs Kiosk to the old grade. It greatly increases recreation opportunities but I believe this should be made wheelchair accessible by obtaining R/W through the Keeler property.

However, I am very concerned with the present move away from the previous Park support of the project by changing the "Purpose and Need" statement, thus excluding wheelchair access. As such, I implore you to find ways to make peace with the County proposal in the following areas:

1. Do whatever is necessary to be able to utilize the County funding already designated for this project. That means use their standards. Where not possible, meet with County and Federal administrators to modify the project so that AASHTO can be met enough to use the County funding AT ALL COSTS.
2. Do whatever you can to work with the County at "closing the gap" on making the entire route wheelchair accessible. This can be done in more than 1 way:
 - a. Accept the County's modified alternative, via their widths and corridor location.
 - b. Modify the County's modified alternative to provide a split use trail for the segment in questions: Use the same or similar corridor they recommend with similar grades, but develop the route to only accommodate wheelchairs and touring bikes. The narrowed width would reduce the number of trees and amount of soil disturbance. Allow horse and hikers to use the higher existing path.

3. Do whatever is necessary to maintain the national industry trail standards where possible. It is upsetting that ONP appears to not be concerned with public safety or public access needs.

In conclusion, this is a world heritage trail in almost a world heritage setting. (This area does not meet the definition of a world heritage and treating like it does violates trust already established with the Park previously. It also pollutes the definition of world heritage. The Federal Government recognizes County and State needs take some precedence over Federal regulations where State regulations are more stringent. It is obvious that meeting the County proposal better meets the national needs of the national aging population then the new local planners.


Page 2 attachment:

The following are the questions you asked to be addressed:

Question 1: Are any actions described unclear?

It is unclear at what step of the process who, when, and why the "Purpose and Need" for this project was changed. Since the Park Service is a National, then you will better meet national needs by providing people of all mobility levels the chance to engage in a Regional draw.

Question 2: Is the information complete and accurate? DO you have more information that should be considered?

No. I have reviewed some of the data that your office prepared and I compared it with some of the data prepared by the County. The County's modified alternative was not included in your analysis, even though they responded to ONP's request in a timely manner, I feel the County is closer in line. I also believe they are more experienced. Request an independent verifier to compare the information.

Question 3: Are there specific reasons an alternative would not work?

Relying on the Park to fund the project is not acceptable. Since the current Park seems motivated against it, there is a lack of trust the amount of funds will be found to construct it. It is not fair to other Park programs to divert all the funding here. Since those funds are "emergency" funds it would be easier to find "emergency" reasons to spend the funds then it would to fund this project.

Question 4: Is there an alternative we did not consider that would better meet the Purpose and Need?

Yes. Even though they responded to your request, the Modified County Proposal was ignored.

Question 5: Are the actions considered consistent with applicable laws and actions?

No. Your proposal fails the access issues in denying the east end be accessible and possibly going with minimal widths on the rest of the project.

Question 6: Is the analysis of the impacts accurate and complete?

No. Your numbers do not look fair. The method and timing used to drop the original "Purpose and Need" looks like someone was trying to stack the analysis process against the County proposal.

Question 7: How would the proposal affect me and my use of the Park?

It could benefit all humans, public and employees with access issues. It could benefit all my life needs: from infants to elderly parents, from strollers to wheelchairs. But it does not.

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 138

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98362
USA
E-mail: [REDACTED]

Correspondence Information

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Correspondence Text

Dear Supt. Gustin,

Our daughter, [REDACTED], was a passionate advocate for maximum accessibility of trails throughout her 20 years. She passed away suddenly and unexpectedly in July, 2010, but she had already, in her wheelchair, traveled most of the Olympic Discovery Trail available at that time. If she were alive, she would be submitting a strongly worded plea for an entire Spruce Railroad segment that she could access as well as she could all of the rest of the ODT. How odd she would think it to have the only portion of the ODT that didn't meet federal ADA standards be that portion that lies within federal lands!

She also was very interested in accessible trails within Olympic National Park, and noted that although some success has been achieved in building such trails, there have been no new accessible trails, or existing trails made fully accessible, in the last few years. This is a golden opportunity to build a premiere accessible national park trail! She would have been thrilled to get a chance to explore the tunnels when they are reopened.

The 18% grade of portions of Alternative 3, as well as its narrower paving, will make it difficult to use for a considerable portion of our populace, not just those who use a wheelchair. Since ONP has a legal mandate to make trails fully accessible where possible, and it is clearly possible here, this seems like an great opportunity to fulfill that mandate.

Alternative #4 MUCH better meets the needs of potential trail users since it alone meets ADA criteria. We strongly encourage its selection as opposed to #3.

We attempted to make this comment on line but the web site was not functional. We were able to use it earlier in the week and hope that it will be back up before the deadline for comments as have heard from others that they were

also frustrated in their attempts to make a comment.

Olympic National Park is a very important part of our life. We have hiked, skied, ridden horses, or biked on and off its trails many times and continue to find new opportunities each season. We have been closely following the dam removal project and applaud the work. This trail improvement is just one more way to continue to make it a great park!


Thank you for your attention. Please let us know if there is more we can do.

[REDACTED]
[REDACTED]

PEPC Project ID: 29848, DocumentID: 43392

Correspondence: 139

Author Information

Keep Private: No
Name: Frances G. Charles
Organization: Lower Elwha Klallam Tribe  Official Rep.
Organization Type: Q - Tribal Government
Address: 2851 Lower Elwha Road
Port Angeles, WA 98363
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: Date Received: 10/18/2011
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Correspondence Text

Dear Superintendent Gustin:

The Lower Elwha Klallam Tribe, as a jurisdiction and contributing part hosting portions of the Olympic Discovery Trail (ODT), appreciates this opportunity to comment on the Environmental Assessment put forth by the Park Service. The Tribe has been an active partner in the development of the ODT and has an elevated interest in the many advantages this low-impact transportation conduit holds for current and future generations. A safe and universally accessible trail brings recreational, educational, cultural, and economic opportunities benefiting surrounding and visiting communities for years to come.

In light of the recent increasing trend of diabetes and obesity in our collective communities and this nation, as well as the number of disabled veterans returning from the Afghan and Iraq wars, welcoming opportunities for exercise, rehabilitation and/or recuperation are severely limited. The Spruce Railroad Trail (SRRT) offers a venue for exercise and rehabilitation within the setting of one of the most breath taking scenes our National park system has to offer. In addition, this is an incredible opportunity to capitalize on tourism, eco-tourism and cultural enlightenment.


Please do not miss this chance to develop the SRRT portion of the ODT in compliance with the American Disabilities Act of 1990 (ADA) so that all Americans, native and otherwise, foreign visitors and future generations can enjoy our National Park system regardless of their state of mobility. An 18% grade is not ADA compliant, nor is it universally accessible. Please, design the paved portion of the trail to safe design standards for all non-motorized modes of transportation with an 8-ft minimum width rather than the Park's preferred 6'ft. width. Not only is an 8-ft. width safer, it will comply with the American Association of State Highway and Transportation Officials (AASHTO) standards, thus allowing for the acquisition of federal grant funds to expedite trail completion.

Sincerely,
Frances G. Charles, Chairwoman
Lower Elwha Klallam Tribe

cc: Clallam County Board of Commissioners, Port Angeles City Council

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 140

Author Information

Keep Private: No
Name: Randall McCoy
Organization: Alternative Transportation Advocacy of Port Angeles  Official Rep.
Organization Type: L - Non-Governmental
Address: not provided
Port Angeles, WA 98362
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
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Correspondence Text

Dear Superintendent Gustin,

Since its inception in 2007, the Alternative Transportation Advocacy of Port Angeles (ATAPA) has been comprised of and represents over 160 members of the greater Port Angeles, Sequim, and Clallam County areas. Originally an organization for cyclists focused on the betterment of infrastructure and cycling awareness on the north face of the Olympic Peninsula, ATAPA has embraced the philosophy of multi-modal transportation and includes the interests and concerns of those traveling by alternative (no-motorized) means.

It is of great concern to the majority of our constituents that the National Park's preferred alternative, Alternative #3 is not deemed safe by the American Association of State Highway Transportation Officials (AASHTO), is not universally accessible, and does not conform to the Americans with Disabilities Act of 1990 (ADA). The preferred proposed alternative (#3) includes a wheelchair impassable, non-ADA compliant segment of trail with an 18% grade within 0.5 miles from the east end of the SRRT trailhead. This effectively excludes members of our organization and the local and visiting community at large who are either mobility impaired or otherwise unable to traverse such steep terrain. Additionally, constructing a 6-ft. wide paved trail as opposed to an AASHTO compliant 8-ft wide (minimum) trail does not allow for safe passign distances between trail users and relegates the funding source for trail construction to the Park's collected fee funds and/or private contributions.

This is unacceptable to us. We beseech you to make the appropriate changes to the Park's preferred alternative so that it meets univrsal, ADA, accessibility standards to accommodate all trail users, mobility impaired or otherwise. Also, please design the paved portion of the trail to a minimum 8-ft. width such that it will become safer for all travelers and comply with AASHTO standards. By so doing, the ability to acquire federal grant dollars could made available as a source for construction funding. Additionally, please design the gravel, non-paved portion of the trail

to a standard width of 4-ft. for the safe traverse of horseback riders, mountain bikers, runners, etc.

This is a tremendous opportunity for the Park to address several key issues. Allowing for safe, non-motorized transport around Lake Crescent will give would be visitors to the Olympic Peninsula an alternative, low-impact, sustainable, zero carbon emissions means to experience the Park and surrounding environs. An ADA/AASHTO compliant designed SRRT would provide for a safe and pleasant way for mobility impaired infirmed, obese, diabetic, very young and recuperating injured citizens/visitors to experience one of the most beautiful places on earth. Please do not let a mere 600 - 700 feet of this segment of trail become a blockage point along a 120 mile trail that has the potential to be one the best rail to trail projects in America.

Thank you,
Randall E. McCoy, Founder
Alternative Transportation Advocacy of Port Angeles

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 141

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Port Angeles, WA 98363
USA
E-mail: [REDACTED]

Correspondence Information

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Correspondence Text

Dear Supt. Gustin

At the informational meeting Sept 21 I asked if the Park had any wheelchair accessible trails. Two such trails were mentioned, but when I checked them out they were hardly suitable for w.c.

Two years ago my wife lost most of her sense of balance. She can use her legs, but she can't ride a bicycle so I came up with an invention so that she could still cycle. However, the grade you described in alternative #3 is just too steep for either a wheelchair or our pentacycle. You need a grade less than 8%. I can push my sister-in-law over miles of trails in Ohio and Florida, but when it comes to Olympic Natl' Park we are limited to a few parking lots.

Why not make the Spruce Railroad Trail suitable for wheelchairs. 8% grade is really too steep, but it is possible only for short distances. If you lessen the grade to about 7%, then when the Spruce Railroad Trail is finished, you might have a world class trail going through ONP.

[REDACTED]

PEPC Project ID: 29848, DocumentID: 43392
Correspondence: 142

Author Information

Keep Private: No
Name: [REDACTED]
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
Sequim, WA 98382
USA
E-mail:

Correspondence Information

Status: New Park Correspondence Log:
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Correspondence Text

Dear Superintendent Gustin:

I am disappointed in ONP's proposal for the extension of the Olympic Discovery Trail through the Park along Lake Crescent. I had hoped for greater inclusion.

The 6 and 4 width limitation - I can live with. As a physical therapist, I find this width to be marginally hazardous for the physically disabled to share with younger cyclists, or anytime there are a number of users in close proximity. A wheelchair cuts a wide swath; young, inexperienced or rude cyclists, roller bladders or skate boarders will cause discomfort in disabled users and likely others using ambulatory assistance. So be it.

What I find unconscionable is the Park's disregard of the needs of handicapped users on the "east beach" approach to the Trail. Failing to accommodate them in accessing what will soon be a phenomenally scenic experience for the able-bodied, is -to my mind- insensitive, if not mean. It can so easily be remedied.

Clallam County has sent an amended design for this approach, one that removes none of the 11" diameter trees, but increases removal of the lesser sized ones by 77. While there is more excavation in the County's plan than the Park's, the reduction of the impossible-to-climb in a wheelchair 18% grade to a manageable 8% is a trade-off I cannot comprehend the Park's failure to embrace.

Unfortunate as it is to remove trees, they can and will be replaced. A mound of dirt whose beauty is in the eye of the beholder yet an impediment to others, can be redesigned to be equally pleasing.

Opening the east entrance - the one closest to the population centers of the peninsula and the Seattle area - seems a reasonable request. Requiring further driving on the winding, tedious route around beautiful Lake Crescent to the

wheelchair accessible entrance is not.

I commend your staff on its labors, and the Park's willingness to support the Olympic Discovery Trail as it courses toward the coast.

I respectfully encourage your further examination of the eastern approach.

Redesigning the 18% grade to a wheelchair-manageable grade is doable, and it is fair to all.

Thank you.

Sincerely,

