

# ERRATA

**Olympic National Park**  
***Emergency Action to Temporarily Relocate the Enchanted Valley Chalet for the Protection of***  
***the East Fork Quinault River***  
***Environmental Assessment***  
**July 2014**

The Emergency Action to Temporarily Relocate the Enchanted Valley Chalet for the Protection of the East Fork Quinault River Environmental Assessment (EA) was released for a 16-day public review from May 21 to June 5, 2014. A total of 182 pieces of correspondence from individuals, organizations, and local governments were received during the public review period.

The EA analyzed impacts from the moving of the Enchanted Valley Chalet 50-100 feet from the bank of the East Fork Quinault River in an effort to keep the chalet from collapsing into the river and adversely impacting the streambed, hydrology, water quality, fisheries, other associated natural resources, and local wilderness character.

Part 1 of the Errata documents minor edits to text in the EA. These changes correct, clarify or modify original text. There are no edits or corrections which modify the determination of potential effects or which substantively amend the proposed action.

Part 2 documents substantive comments (stated by one or more respondents) received during public review, and park responses. The comments are grouped into 13 topic categories. These Errata must be attached to the original EA to comprise the full and complete record of the environmental impact analysis completed for this initiative.

## Part 1: Edits and Corrections to EA

1. The term "nonhistoric" was used many times throughout the EA to address the foundation. While the foundation has had improvements, it has been verified as historic. The term "nonhistoric" has been removed from in front of "foundation" throughout the document.
2. The foundation will not be removed.
3. Helicopter use could occur throughout the day between the limited operating periods for threatened bird species (>2 hours after sunrise and <2 hours before sunset).
4. The Threatened and Endangered Species analysis has been revised to reflect the suggested revisions in consultation with the U.S. Fish and Wildlife Service (USFWS). The revisions consisted mainly of separating out the impacts to bull trout from the impacts to marbled murrelets and spotted owls and minor fixes incorporating the term "negative" in place of "adverse" to be consistent with direction provided through our consultation with the USFWS.

5. The mitigation measure, "No in-stream work would be conducted" has been added under Threatened and Endangered Species as suggested in consultation with the U.S. Fish and Wildlife Service.
6. Consultation information with the Advisory Council on Historic Preservation has been added to the Consultation and Coordination section (Chapter 4 of the EA).
7. Positive effects have been added to the natural and undeveloped qualities of wilderness character in the Minimum Requirement Analysis on page 52 of the EA; as well as to the social/recreational/experiential effects on page 53; and a negative effect has been added to the social/recreational/experiential effects on page 53 as well as to the social/recreational/experiential effects on page 55. The minimum requirement analysis has been signed.
8. Final tribal, federal, and state agency consultation letters have been added to the appendix.

## Part 2: EA Comments and Responses

This section summarizes the substantive comments received during the public review period of the EA and general comments needing further clarification. It does not include the entire correspondence text from any individual letter, but captures the primary concerns organized by topic. All correspondence received by the parks is contained in the project administrative record.

### *Alternatives: Alternatives Eliminated*

**Concern ID:** 51152

**CONCERN STATEMENT:** The EA should present in the "Alternatives considered but not analyzed further" section, alternatives that reflect minimal manipulation (2005), moderate manipulation (2014), and extensive manipulation alternatives. It would be reasonable to separate a minimum manipulation alternative based on the 2005 alternative as that alternative had been previously approved, had been implemented, and had been successful. (Page 12)

**Response:** The EA presents minimal river manipulation as well as more extensive river channel manipulation alternatives under the "Alternatives Considered but Not Analyzed Further" section on pages 11 and 12. These alternatives are out of the scope of the analysis because they do not meet the purpose and need of the project, are technically or economically infeasible, or are not within law and NPS policy. Manipulation of the river channel would have long-term adverse impacts on the natural, untrammeled, and undeveloped qualities of wilderness character.

Per section 6.3.5 of the NPS Management Policies 2006, "All management decisions affecting wilderness must be consistent with the minimum requirement concept." The section further states, "Administrative use of motorized equipment or mechanical transport will be authorized only if determined by the superintendent to be the minimum requirement needed by management to achieve the purposes of the area, including the preservation of wilderness character and values, in accordance with the

Wilderness Act; or in emergency situations involving the health or safety of persons actually within the area." Per section 6.3.7, "The principle of nondegradation will be applied to wilderness management, and each wilderness area's condition will be measured and assessed against its own unimpaired standard. Natural processes will be allowed insofar as possible, to shape and control wilderness ecosystems. Management should seek to sustain the natural distribution, numbers, population composition, and interaction of indigenous species. Management intervention should only be undertaken to the extent necessary to correct past mistakes, the impacts of human use, and influences originating outside of wilderness boundaries." Lastly, section 4.6.6 states, "The Service will manage watersheds as complete hydrologic systems and minimize human-caused disturbance to the natural upland processes that deliver water, sediment, and woody debris to streams...The Service will protect watershed and stream features primarily by avoiding impacts on watershed and riparian vegetation and by allowing natural fluvial processes to proceed unimpeded. When conflicts between infrastructure and stream process are unavoidable, NPS managers will first consider relocating or redesigning facilities rather than manipulating streams."

The 2005 EA for the Enchanted Valley Chalet was never finalized and alternatives identified within that EA were never approved. There have been no river manipulation activities since 2005.

**Concern ID:** 51159

**CONCERN STATEMENT:** I am for moving it out of harms way, completing the second EA and then taking care of business. I am 100% aainst tearing it down or preserving only a part of it.

Many of us feel that the river threatened the chalet about 10 years ago, and in 2005 low-impact measures were taken resulting in protection to the chalet for the past 8 years. We feel low-impact solutions do exist and that some extraordinary steps might need to be looked at (solutions, equipment, helicopter, horse teams, people, support items, future shoring up, etc.)protection to the river while protecting the Chalet.

The chalet has served as a back country ranger station and a four season emergency shelter for the past 60 years and should continue to do so if we are able to find a lasting solution.

Speaking of a lasting solution, I'd like to share my thoughts for the long-term.

If possible, my first choice would be to keep it in the Enchanted Valley off toward the base of the mountain or even elevated. I do not have the full picture not all the expertise to speak to "how" but I do know there has to be measures that all groups can agree to. I would urge there to be a multi-level team of experts that you can extract a combined concept from.

My second choice would be to move it to the Kestner Homestead in either the rear meadow or to the North meadow. It would be in a like setting and could tell the story of not only the Enchanted Valley but the story of the Quinault area. This would also be a great addition to the wonderful Kestner tour and would bring another asset.

**Response:**

Per section 6.3.5 of the NPS Management Policies 2006, "All management decisions affecting wilderness must be consistent with the minimum requirement concept." The section further states, "Administrative use of motorized equipment or mechanical transport will be authorized only if determined by the superintendent to be the minimum requirement needed by management to achieve the purposes of the area, including the preservation of wilderness character and values, in accordance with the Wilderness Act; or in emergency situations involving the health or safety of persons actually within the area." Per section 6.3.7, "The principle of nondegradation will be applied to wilderness management, and each wilderness area's condition will be measured and assessed against its own unimpaired standard. Natural processes will be allowed insofar as possible, to shape and control wilderness ecosystems. Management should seek to sustain the natural distribution, numbers, population composition, and interaction of indigenous species. Management intervention should only be undertaken to the extent necessary to correct past mistakes, the impacts of human use, and influences originating outside of wilderness boundaries." Lastly, section 4.6.6 states, "The Service will manage watersheds as complete hydrologic systems and minimize human-caused disturbance to the natural upland processes that deliver water, sediment, and woody debris to streams...The Service will protect watershed and stream features primarily by avoiding impacts on watershed and riparian vegetation and by allowing natural fluvial processes to proceed unimpeded. When conflicts between infrastructure and stream process are unavoidable, NPS managers will first consider relocating or redesigning facilities rather than manipulating streams."

Moving the structure closer to the valley wall would put it at the base of multiple known avalanche chutes. Other options within the valley are within wetland areas or would require the removal of several trees. The removal of trees would have long-term, adverse impacts on the natural, untrammled, and undeveloped qualities of wilderness character. Placing the structure within the wetland area may be an adverse impact under Executive Order 11990 (Protection of Wetlands). Aside from EO 11990, moving the structure will have short-term adverse impacts associated with the occupancy and modification of floodplains if there is a practicable alternative (to not keep the structure in the floodplain) per Executive Order 11988 (Floodplain Management).

The comment regarding moving the chalet to Kestner Homestead is out of the scope of the analysis in this EA. Various feasible alternatives will be considered for the final disposition of the chalet in the next National

Environmental Policy Act (NEPA) process.

**Concern ID:** 51162

**CONCERN STATEMENT:** From the perspective of OFCO's Wilderness committee, the situation is sacrilege for those of us schooled in the western intellectual tradition of naturalism; in the teachings of John Muir and Aldo Leopold. The ministering of the Wilderness Act was intended to establish places where nature can take its course. The natural disintegration of an old human intrusion in Wilderness should be considered a moment to observe - to view as a teaching opportunity. Or if it is perceived inappropriate to enable natural disintegration, dismantling or burning seem appropriate options. But today society seemingly has come to prefer value preserving mental images of Wilderness intrusions unseen, as historic bits of old school western romanticism.

Once again, politics interferes. The meaning of Wilderness is lost in a society that no longer values the imagination of wild places; untrammelled places. "To be in Wilderness as a visitor who shall not remain" is apparently felt by only a small minority today. Watching human impact fade away in a few places has always been a sense of satisfaction for some of us, but the majority disagree, clearly not understanding what is wilderness. Roderick Nash's "Wilderness and the American Mind needs a contemporary chapter.

**Response:** This EA for the "Emergency Action to Temporarily Relocate the Enchanted Valley Chalet for the Protection of the East Fork Quinault River" analyzes the temporary relocation of the chalet so that natural river processes within the designated wilderness can continue unimpeded.

Natural disintegration of the structure in its current location on top of an unconsolidated and unstable bank, would eventually lead to this man-made structure falling into the river and potentially impeding the natural flow of the East Fork Quinault River. In its current location, the safety risk is too high for park staff to dismantle and remove the structure. Burning the structure in place was considered out of the scope of the analysis in this EA and may be an alternative considered in the next, more comprehensive and chalet-specific National Environmental Policy Act (NEPA) process.

This subsequent NEPA process will analyze various alternatives toward a final determination of the disposition of the chalet. This determination could not be analyzed in the current "concise" EA which is being conducted under special authority from the Department of the Interior (43 CFR 46.310) to address the immediate threat of resource damage caused by the chalet collapsing into the river. The final determination of the structure requires a much more comprehensive analysis that could not be conducted in the short timeframe given the need for the emergency action in this "concise" EA.

**Concern ID:** 51389

**CONCERN STATEMENT:** I just returned from a backpack to Enchanted Valley last weekend. Obviously, the chalet is in danger of collapsing into the Quinault River, so something must be done. I question, though, whether a temporary move is the correct alternative.

It seems to me that the ultimate solution is to dismantle the structure. I understand there is historic significance to this building. However, it is not part of the natural environment. Accordingly, the environmental and natural aesthetic of a national park should take precedence. There is no need for the chalet as current needs of the public and the park are being met without it. It seems a waste of taxpayer money to do anything other than to remove this structure.

To save cost even further, I wonder if there is not an even simpler alternative. If all environmentally hazardous materials are removed from the structure, it could be allowed to be reclaimed by the river. The materials comprising the chalet appear to be mostly wood. What is the difference between having sawn and shaped wood falling into the river and having a tree falling into the river, a common occurrence?

**Response:**

This EA for the "Emergency Action to Temporarily Relocate the Enchanted Valley Chalet for the Protection of the East Fork Quinault River" analyzes the temporary relocation of the chalet so that natural river processes within the designated wilderness can continue unimpeded. Natural disintegration of the structure in its current location on top of an unconsolidated and unstable bank, would eventually lead to this man-made structure falling into the river and potentially impeding the natural flow of the East Fork Quinault River. In its current location there is too high a risk for staff to safely dismantle and remove the structure. The subsequent NEPA process will analyze various alternatives toward a final determination on the disposition of the chalet. This determination could not be analyzed in the current "concise" EA which is being conducted under special authority from the Department of Interior (43 CFR 46.310) to address the immediate threat of resource damage caused by the chalet collapsing into the river. The final determination of the structure requires a much more comprehensive analysis that could not be conducted in the short timeframe given the need for the emergency action in the "concise" EA.

***Proposed action: Comments generally in support of the proposed action***

**Concern ID:** 51091

**CONCERN STATEMENT:** My only concern with moving the chalet is that it is temporary and we all know how temporary projects end up. This is going to likely be a long-term placement because a permanent solution is going to be so costly or difficult.

When this story was first in the news there was a guy who runs a house moving business in Port Angeles I believe that was trying to stir up a lot of hype, and from reading this document I'm assuming he is the one who provided a lot of the information about how the project would work and how long it would take. He also threw out some cost figures in the local papers that were around \$20-40,000 which if the NPS has not done any further investigating I would say is a pretty unlikely budget to be met. It costs more than that to move a smaller building in a easily accessible neighborhood.

If the NPS is going to do this, at least use someone reputable rather than the guy creating the most hype and clearly lying about feasibility and cost.

**Response:**

The NPS has conducted an independent evaluation of costs and methods associated with moving the structure. The implementation of the proposed action of this EA would meet the all laws, regulations, and policies that apply to procurement of services or supplies.

***Proposed action: Comments in support of the proposed action mainly in regard to protecting the chalet***

**Concern ID:** 51089

**CONCERN STATEMENT:** First, I would like to thank the Park Service for their efforts to save the Chalet and allowing for public comment. It is an important part of the local and Parks heritage. I do have a question however. When a river changes course and washes a road out, boulders are placed in a strategic manner, saving the roadway as it did downstream some years back. Why can't(1 man sized)rock or boulders be brought in by helicopter, staged in the immediate area where volunteers could place the rock. Typar or an environmentally friendly material, lining the bank behind the rock would stop the shifting river channel. Rock could be placed further upstream to divert the river back to it's native path. Assuming that reclaiming the riverbank is the ultimate goal, once the river is diverted back where it once was, the foundation on the structure could be repaired or replaced, saving funds and all or most of the work could be done by volunteers without environmentally unfriendly material and putting undo pressure or destroying parts of the trail and landscape.

**Response:**

The EA does present minimal river manipulation as well as more extensive river channel manipulation alternatives under the "Alternatives Considered but Not Analyzed Further" section on pages 11 and 12. These alternatives are out of the scope of the analysis because they do not meet the purpose and need of the project, are technically or economically infeasible, or are not within law and NPS policy. Any manipulation of the river channel would have long-term adverse impacts on the natural, untrammled, and undeveloped qualities of wilderness character.

Per section 6.3.5 of the NPS Management Policies 2006, "All management decisions affecting wilderness must be consistent with the minimum requirement concept." The section further states, "Administrative use of motorized equipment or mechanical transport will be authorized only if determined by the superintendent to be the minimum requirement needed by management to achieve the purposes of the area, including the preservation of wilderness character and values, in accordance with the Wilderness Act; or in emergency situations involving the health or safety of persons actually within the area." Per section 6.3.7, "The principle of nondegradation will be applied to wilderness management, and each wilderness area's condition will be measured and assessed against its own unimpaired standard. Natural processes will be allowed insofar as possible, to shape and control wilderness ecosystems. Management should seek to sustain the natural distribution, numbers, population composition, and interaction of indigenous species. Management intervention should only be undertaken to the extent necessary to correct past mistakes, the impacts of human use, and influences originating outside of wilderness boundaries." Lastly, section 4.6.6 states, "The Service will manage watersheds as complete hydrologic systems and minimize human-caused disturbance to the natural upland processes that deliver water, sediment, and woody debris to streams...The Service will protect watershed and stream features primarily by avoiding impacts on watershed and riparian vegetation and by allowing natural fluvial processes to proceed unimpeded. When conflicts between infrastructure and stream process are unavoidable, NPS managers will first consider relocating or redesigning facilities rather than manipulating streams."

**Concern ID:** 51101

**CONCERN STATEMENT:** I would like to encourage the temporary relocation of the Enchanted Valley Chalet. This chalet has been an important shelter for station and has served as a back country ranger station for many decades. I appreciate the fact that the national parks is considering protecting this shelter. It has been relocated before and I would hope that the low-impact solution of moving it can be undertaken once again.

**Response:** The chalet has not been previously relocated; it remains in its original location as built.

**Concern ID:** 51203

**CONCERN STATEMENT:** Admittedly Enchanted Valley is beautiful beyond belief with or without a structure in it BUT the chalet is a part of the Valley's history, interaction with early residents of Puget Sound and a part of the many stories around the Park as a whole. From these inter related pieces one can gain an understanding of how we arrived at our present setting.

I am all for the relocation and preservation of the structure if possible. It would certainly seem cost effective if efforts were made - be it vanes,

bulkheads, etc. - to help channel or positively influence the course of the Quinault if it does what Rivers do in the future and once again threatens the building. If you're going to spend the money, spend it well so it doesn't have to be spent again in the future.

**Response:**

The EA does present minimal river manipulation as well as more extensive river channel manipulation alternatives under the "Alternatives Considered but Not Analyzed Further" section on pages 11 and 12. These alternatives are out of the scope of this analysis because they do not meet the purpose and need of the project, are technically or economically infeasible, or are not within law and NPS policy. Any manipulation to the river channel would have long-term adverse impacts on the natural, untrammeled, and undeveloped qualities of wilderness character.

Per section 6.3.5 of the NPS Management Policies 2006, "All management decisions affecting wilderness must be consistent with the minimum requirement concept." The section further states, "Administrative use of motorized equipment or mechanical transport will be authorized only if determined by the superintendent to be the minimum requirement needed by management to achieve the purposes of the area, including the preservation of wilderness character and values, in accordance with the Wilderness Act; or in emergency situations involving the health or safety of persons actually within the area." Per section 6.3.7, "The principle of nondegradation will be applied to wilderness management, and each wilderness area's condition will be measured and assessed against its own unimpaired standard. Natural processes will be allowed insofar as possible, to shape and control wilderness ecosystems. Management should seek to sustain the natural distribution, numbers, population composition, and interaction of indigenous species. Management intervention should only be undertaken to the extent necessary to correct past mistakes, the impacts of human use, and influences originating outside of wilderness boundaries." Lastly, section 4.6.6 states, "The Service will manage watersheds as complete hydrologic systems and minimize human-caused disturbance to the natural upland processes that deliver water, sediment, and woody debris to streams...The Service will protect watershed and stream features primarily by avoiding impacts on watershed and riparian vegetation and by allowing natural fluvial processes to proceed unimpeded. When conflicts between infrastructure and stream process are unavoidable, NPS managers will first consider relocating or redesigning facilities rather than manipulating streams."

***Proposed action: Comments opposed to the proposed action***

**Concern ID:** 51126

**CONCERN STATEMENT:** I understand the desire to save the Enchanted Valley Chalet by moving it away from the river. However, although the chalet has some historic value, I think the historic value would be diminished by moving it from its original

location.

I seriously doubt that leaving the chalet alone and allowing it to eventually fall into the river will harm the river or the fish in it.

**Response:**

Moving the chalet 50-100 feet from the river bank will change the historic setting of the structure. Park staff has consulted with the Washington State Historic Preservation Office (SHPO) as well as with the Keeper of the National Register of Historic Places (NRHP). This early consultation resulted in the structure is not likely to lose its listing status on the NRHP, but it could lose some of its significance.

The EA articulates a variety of impacts that could be caused by allowing the chalet to fall into the river. The East Fork Quinault River is officially designated by the US Fish and Wildlife Service as critical habitat for the threatened bull trout (USFWS 2010, Critical Habitat Rule, accessed 6/16/14, <http://www.fws.gov/pacific/bulltrout/pdf/BTCHFR101810.pdf>). "Under the Endangered Species Act, critical habitat identifies geographic areas that contain features essential for the conservation of a listed species. Critical habitat designations provide extra regulatory protection that may require special management considerations and the habitats are then prioritized for recovery actions." (USFWS 2010, accessed 6/16/14, <http://www.fws.gov/pacific/bulltrout/CriticalHabitat.html>)

If the structure were allowed to fall into the river it could break into pieces small enough to be carried downstream by the river, it could break into pieces large enough to dam a canyon located just downstream of Enchanted Valley, or cause an unnatural shift in natural river migration. These actions would all have an adverse effect on the natural, untrammeled, and undeveloped qualities of wilderness character. Uncertainty of the effect has lead us to prepare this concise EA.

**Concern ID:**

51141

**CONCERN STATEMENT:** If you plan on using ANY power equipment you are not in compliance with the Wilderness act. I would also suggest you look at NEPA. I doubt you are in compliance. There is no long term solution that is viable in a braided river valley. Let nature take it coarse. The Park has plenty of other work where the money would be put to better use. Many of your trails are in need of serious work. Building do not belong in a wilderness.

**Response:**

In accordance with the Wilderness Act and NPS Management Policies, a minimum requirement analysis has been conducted for the action of moving the structure and can be found in Appendix I of the environmental assessment (EA).

While the Department of the Interior (DOI) has not characterized this action as an emergency action, it, as well as the Pacific West Regional Office of the National Park Service (NPS), and the National Park Service's Environmental Quality Division have approved this "concise" environmental assessment

(EA) to address the imminent environmental harm. The EA is being conducted under a waiver of NPS Director's Order-12 (DO-12), and instead utilizing DOI National Environmental Policy Act (NEPA) regulations 46.310 a and b.

Immediate action is dependent on funding. Any funds spent on this project will indeed divert funds from other park projects.

### ***Cultural Resources: Guiding Policies, Regulations, and Laws***

**Concern ID:** 51106

**CONCERN STATEMENT:** There is of course nothing in the National Historic Preservation Act that prohibits the loss of any particular structure, yet the Wilderness Act is abundantly clear regarding non-conforming structures and use of mechanized equipment therein. The pathway (i.e., road) through which the chalet would be moved, as well as its subsequent resting place, will directly impact a portion of one of our nation's finest natural valleys. This, of course, entails degradation of the immediate area, though the valley as a whole will be degraded via repeated heli flights and motors used for chalet lift/transportation.

**Response:** Correct, the National Historic Preservation Act does not require the protection of historic structures. It does, however, provide guidance on the appropriate preservation and documentation of historic structures.

In accordance with the Wilderness Act and NPS Management Policies, a minimum requirement analysis has been conducted for the action of moving the structure and can be found in Appendix I of the environmental assessment (EA).

There is currently no road within or near the project area and no roads will be developed to carry out the action within this EA.

Impacts on wilderness resources were analyzed in the EA on pages 24 and 25 and within the minimum requirement analysis worksheet in Appendix I of the EA.

Further impact analysis will be conducted under a subsequent and more comprehensive NEPA process in the determination of the structure's final disposition.

### ***Impact Analysis: Impact Analyses***

**Concern ID:** 51155

**CONCERN STATEMENT:** The EA should clarify the Cumulative Impacts statements which imply that there will be no further administrative use impacts. Will there continue to

be a ranger camp or station in the Enchanted Valley from this time forward? If there will be continued administrative use in the valley, including a ranger camp, this sentence needs to be rewritten to reflect ongoing administrative uses of the valley. (Page 14, paragraph 2 and all following Cumulative Impact sections)

**Response:** Ongoing administrative use within the valley has not yet been determined.

**Concern ID:** 51156

**CONCERN STATEMENT:** The EA should clarify its statement that removal of the remaining foundation will protect water quality, fish habitat and natural flow regimes. There appears to be less than 4 yards of material remaining in the foundation. The park is placing considerably more material into the Elwha River and that material is not seen as affecting water quality or fish habitat. As active as the Quinault is, any piece of foundation will be quickly rounded and ground up as it is in the Elwha. (Page 25, paragraph 1)

**Response:** The EA has been revised to reflect that the foundation will remain in place at least until the determination of the final disposition of the chalet is made in the next NEPA process.

The Elwha River Ecosystem Restoration/Final Environmental Impact Statement (June 1995) (pages 38-66) does address the short- and long-term adverse effects to water quality and fish habitat from dam removal.

### *Miscellaneous Topics: General Comments*

**Concern ID:** 51138

**CONCERN STATEMENT:** This "emergency" EA is necessary only because NPS ignored the warnings of its own hydrologist and cultural resources staff. "The only way to insure the Chalet's safety, in the short term and with any degree of certainty, is to relocate it immediately." wrote NPS regional hydrologist Paul Kennard in his memo of June 29, 2005. Instead, NPS closed its 2005 "Enchanted Valley Chalet Preservation Maintenance Environmental Assessment" without reaching a decision.

**Response:** The 2005 Draft Environmental Assessment (EA) for the Enchanted Valley Chalet was never finalized because the river shifted its course prior to completion of the EA.

**Concern ID:** 51204

**CONCERN STATEMENT:** Washington Trails Association acknowledges that there is an associated cost to temporarily relocating the chalet. While we support the National Park Service's proposed action, we acknowledge that the incurred costs should not deplete the budgets of other park functions, such as trail maintenance and recreation, which are currently underfunded.

**Response:** Immediate action is dependent on funding. Any funds spent on this project will indeed divert funds from other park projects.

**Concern ID:** 51388

**CONCERN STATEMENT:** The funding for preserving this structure is available from private sources. As protectors of our nations treasures, you have the ability to facilitate or allow private fund raising for this project. Please lend the power of your respective offices to encourage private fundraising to save this structure. Please expedite any permit processes that need to be satisfied.

**Response:** As a federal agency, the National Park Service is not allowed to lobby for or encourage private fundraising.

### ***Other NEPA Issues: General Comments***

**Concern ID:** 51094

**CONCERN STATEMENT:** However, we cannot agree that the proposed action, moving the chalet intact up to 100 feet from the stream bank, is the most efficient, effective or economic means of meeting the stated purpose and need. Both can be more easily met, with far fewer impacts and at a fraction of the cost, by dismantling, disassembling or razing the building in place.

We note that "[a]fter the chalet is removed, the NPS will embark on a separate planning process to assess options for final disposition of the chalet" [p.6]. While understanding the desire to prevent a collapse of the building into the river with next fall and winter's rains, this emergency EA in affect undercuts the purpose of the second by investing significant resources into a predetermined outcome: moving the chalet to another location in Enchanted Valley. Clearly, it would be more appropriate to complete a single EA or EIS that would allow a full examination and discussion of all the impacts as well as costs of the proposed action and consider other sensible alternatives that were determined to be outside the scope of the current expedited EA.

**Response:** Dismantling, disassembling, or razing the building in its current location is not feasible because the risk to staff safety is too high given the instability of the river bank and that 8' of the chalet has been undercut.

Given the immediate need to keep the structure from falling into the river, the action in this environmental assessment (EA) is merely the first of a two-part National Environmental Policy Act (NEPA) process. This first, expedited, NEPA process addresses the immediate need to protect the river and is being conducted under a special provision allowable, and approved, by the Department of Interior NEPA regulations in 43 CFR 46.310. Otherwise, a standard National Park Service (NPS) Director's Order-12 (DO-12) NEPA process can take a year or more to complete a much more comprehensive analysis by which time this year's fall storm events

would likely further undercut the structure causing it to fall into the river.

The second NEPA process will analyze the final disposition of the structure which may include dismantling, disassembling, or razing, among other possible alternatives yet to be determined. This second NEPA process will be conducted under the standard NPS DO-12 process which may take a year or more to complete. The second NEPA process will provide a vigorous analysis of all available and feasible options, within law and policy, for the final disposition of the structure rather than solely on the protection of the river.

Aside from addressing staff safety, if the next NEPA process determines that dismantling and removal is the best course of action for the structure, moving it from the river bank now would allow park staff the ability to dismantle the structure safely.

**Concern ID:** 51131

**CONCERN STATEMENT:** The EA analyzes an insufficient range of alternatives. The EA examines only two alternatives, the No Action alternative and the Preferred Alternative. The EA states (pp. 11-12) that a number of other alternatives were analyzed but rejected, though no specifics were given as to the reasons for rejecting any of the listed seven rejected alternatives. No reasons are given to the public for why any of the specific alternatives were rejected; without some analysis or rationale, the public cannot judge whether the NPS's reasons are adequate.

NEPA requires an adequate range of alternatives during environmental review, but the Enchanted Valley Chalet EA fails to do so.

**Response:** While the Department of the Interior (DOI) has not characterized this action as an emergency action, it, as well as the Pacific West Regional Office of the National Park Service (NPS), and the National Park Service's Environmental Quality Division have approved this "concise" environmental assessment (EA) to address the imminent environmental harm. The EA is being conducted under a waiver of NPS Director's Order-12 (DO-12), and instead utilizing the Department of the Interior's (DOI) National Environmental Policy Act (NEPA) regulations in 43 CFR 46.310.

Under this special provision, a "no action" alternative is not required in this EA, nor is a full analysis of the alternatives considered but dismissed. On page 11, it is noted that the alternatives considered but not analyzed further were found to be outside the scope of the project because they do not meet the purpose and need of the project, are technically or economically infeasible, or not within law and policy. The next NEPA process may be able to consider some of these alternatives within its scope.

**Concern ID:** 51133

**CONCERN STATEMENT:** The preferred alternative biases any later analysis as to the ultimate disposition of the structure. The preferred alternative in the Enchanted Valley Chalet EA requires such an extensive effort and expense that it makes it unlikely that any subsequent analysis will result in an outcome other than leaving the structure in the place to which the preferred alternative proposes it be dragged.

It appears to us that under the guise of the "emergency" created by the East Fork Quinault River being a wild river that the National Park Service has already decided to expend considerable effort and expense to move the chalet to a new location and retain it there in perpetuity, and that that decision will be made by this EA before the later analysis takes place as to the long-term future of this building.

**Response:**

This EA for the "Emergency Action to Temporarily Relocate the Enchanted Valley Chalet for the Protection of the East Fork Quinault River" analyzes the temporary relocation of the chalet so that natural river processes within the designated wilderness can continue unimpeded. Natural disintegration of the structure in its current location on top of an unconsolidated and unstable bank, would eventually lead to this man-made structure falling into the river and potentially impeding the natural flow of the East Fork Quinault River. Its current location also does not allow park staff to safely dismantle and remove the structure.

The subsequent NEPA process will analyze various alternatives toward a final determination on the disposition of the chalet. This determination could not be analyzed in the current "concise" EA which is being conducted under special authority from DOI (43 CFR 46.310) to address the immediate threat of resource damage caused by the chalet collapsing into the river. The final determination of the structure requires a much more comprehensive analysis that could not be conducted in the short timeframe given the need for the emergency action in the "concise" EA.

**Concern ID:**

51205

**CONCERN STATEMENT:** Several times, the EA mentions removing the "remaining non-historic foundation". It might be noted that, although the masonry surface has been repaired over the years, the bulk of it is the original 1930 foundation. I am not suggesting that any of it be preserved. It has been documented, so that a future environmental review may consider reconstructing it accurately as part of the Chalet's long-term preservation.

However, I also do not think the foundation needs to be removed. Until the river occupies the site (which might be within one year, and is very likely within a decade), it marks an historic site of significance to visitors. Environmental impacts of management actions to disassemble, remove and bury the foundation nearby or fly it out by helicopter are may be greater than abandoning it in place and allowing natural river processes to eventually reclaim it. The only practical means would be to fly in a

compressor and jackhammer, sort the fragments, leaving the river rock and collecting the concrete fragments and flying them out by helicopter. Most of the foundation is river rock, mortared with concrete mixed on site from river sand taken from a sandbar upriver and a minimal quantity of cement (see attachment below). As it does fall into the river, it will return its natural rock and cobble to the river bed, with negligible additional environmental impact.

This is primarily an esthetic issue: balancing the sight of the concrete, against disturbance of the helicopter and jackhammer operations required to remove it.

Similarly, efforts to revegetate the site now occupied by the Chalet seem pointless. The site is likely to be washed away in part within a year, and entirely within a few years. Given that NPS wilderness revegetation manpower is finite, this futile effort will detract from other more beneficial projects within the Park, such as the revegetation of the former Lake Mills reservoir, Olympic Hot Springs Campground or various sites in Seven Lakes Basin. This will have a net negative environmental impact on Olympic Wilderness as a whole.

I request that the decision to invest resources in removing the foundation and revegetating the site be deferred to some indefinite future date, if the river has not taken the site and the course of the river appears stable. It could be considered in the subsequent EA on the long-term fate of the Chalet.

**Response:**

The EA has been revised to reflect that the foundation will remain in place at least until the determination of the final disposition of the chalet is made in the next NEPA process.

Revegetation of the area would involve the dispersal of native seed in areas where impacts to vegetation have created greater vulnerability to erosion of the floodplain. The cost of this type of revegetation would be minimal and without impact on other park projects.

***Purpose and Need: Planning Process and Policy***

**Concern ID:** 51111

**CONCERN STATEMENT:** If there is genuine ecological concern regarding the chalet collapsing into the E. Fork Quinault, the NPS should instead be studying how to appropriately dismantle it. Proceeding in that manner would be in full compliance with the letter and spirit of all relevant federal statutes.

**Response:**

Dismantling, disassembling, or razing the building in its current location is not feasible because the risk to staff safety is too high given the instability of the river bank.

**Concern ID:** 51114

**CONCERN STATEMENT:** I am not sure what the EA is proposing. Is the EA proposing to temporarily move the Chalet or is it assessing the condition of the East Fork of the Quinault River and its effects on the Chalet? I am in favor of moving the Chalet if we are all certain it will be lost in the next rainy season. I am not in favor of allowing the Chalet to simply topple over and fall into the river like all the casualties of trees that that river has taken out already. I am also in favor of doing something heroic to the river and cause it to stop its present channel braiding through the valley. The unique aspects of the Enchanted Valley cannot be under-emphasized.

**Response:** The EA is analyzing an action to protect the East Fork Quinault River.

Any manipulation to the river channel would have long-term adverse impacts on the natural, untrammeled, and undeveloped qualities of wilderness character. Per section 6.3.5 of the NPS Management Policies 2006, "All management decisions affecting wilderness must be consistent with the minimum requirement concept." The section further states, "Administrative use of motorized equipment or mechanical transport will be authorized only if determined by the superintendent to be the minimum requirement needed by management to achieve the purposes of the area, including the preservation of wilderness character and values, in accordance with the Wilderness Act; or in emergency situations involving the health or safety of persons actually within the area." Per section 6.3.7, "The principle of nondegradation will be applied to wilderness management, and each wilderness area's condition will be measured and assessed against its own unimpaired standard. Natural processes will be allowed insofar as possible, to shape and control wilderness ecosystems. Management should seek to sustain the natural distribution, numbers, population composition, and interaction of indigenous species. Management intervention should only be undertaken to the extent necessary to correct past mistakes, the impacts of human use, and influences originating outside of wilderness boundaries." Lastly, section 4.6.6 states, "The Service will manage watersheds as complete hydrologic systems and minimize human-caused disturbance to the natural upland processes that deliver water, sediment, and woody debris to streams...The Service will protect watershed and stream features primarily by avoiding impacts on watershed and riparian vegetation and by allowing natural fluvial processes to proceed unimpeded. When conflicts between infrastructure and stream process are unavoidable, NPS managers will first consider relocating or redesigning facilities rather than manipulating streams."

A subsequent NEPA process will analyze various alternatives toward a final determination on the disposition of the chalet. This determination could not be analyzed in the current "concise" EA, which is being conducted under special authority from DOI to address the immediate threat of resource damage caused by the chalet collapsing into the river. The final

determination of the structure requires a much more comprehensive analysis that could not be conducted in the short timeframe given the need for the emergency action in the "concise" EA.

**Concern ID:** 51120

**CONCERN STATEMENT:** NPCA appreciates a detailed analysis of the impacts that are likely to occur in the process of moving the chalet. However, despite our support of this action NPCA is concerned with some aspects of the Environmental Assessment:

- The EA states on page 53 that there are no positive social, recreational, or experiential effects from the no action alternative (keeping the Chalet in its current location and allowing it to be removed through natural processes), while the negative effect would be to visitors who are familiar with the structure and the setting. NPCA believes the current existence of the structure has a negative effect on the wilderness experience of some users and those future visitors to the Enchanted Valley. These users may see the no action alternative as having a positive recreational and experiential effect because it ultimately leads to the removal the Chalet from the valley. Current and future visitors may question why a boarded up structure that is not open to the public and currently serves no purpose is located in a designated wilderness obstructing views and the untrammled character of the Enchanted Valley. This possible positive effect of the no-action alternative should have also been stated.

**Response:** The Minimum Requirements Analysis in Appendix I in the EA has been revised to address these impacts under the No Action alternative under Part Two, Section 9 "Evaluate the impacts of each alternative" for the topic area "Social/recreational/experiential effects."

**Concern ID:** 51122

**CONCERN STATEMENT:** NPCA appreciates a detailed analysis of the impacts that are likely to occur in the process of moving the chalet. However, despite our support of this action NPCA is concerned with some aspects of the Environmental Assessment:

- The EA again on page 55 states that the action alternative would have a positive social, recreation, and experiential effect by moving the Chalet as it "would provide the public an opportunity to see the structure before a final determination is made on the disposition of the structure." While many of the negative impacts from the action alternative are also discussed, there is no mention of the negative experiential effect of keeping the structure in the valley to future visitors for potentially more than one year. Otherwise, NPCA agrees with the negative impacts discussed related to the effect on the undeveloped character by the action alternative. The EA on page 54 states there would be a negative impact because "the man-made structure would still exist within Congressional-designated wilderness."

**Response:** The Minimum Requirements Analysis in Appendix I in the EA has been revised to address these impacts under the Alternative 2 (the action alternative) under Part Two, Section 9 "Evaluate the impacts of each alternative" for the topic area "Social/recreational/experiential effects."

**Concern ID:** 51137

**CONCERN STATEMENT:** Remarkably, this EA fails to even briefly summarize the historic significance of Enchanted Valley Chalet or cite it's National Register of Historic Places listing, so that readers might begin to appreciate its significance. This is deferred to a subsequent EA on the long-term fate of the Chalet.

**Response:** There is a very brief summary of the history of the Enchanted Valley Chalet, including a statement noting its listing status on the National Register of Historic Places in the "Background" section under Chapter 1 "Purpose and Need" on page 6 of the environmental assessment (EA).

The focus of this EA is on the protection of the East Fork Quinault River, not on the stabilization of the chalet or riverbank. The subsequent National Environmental Policy Act (NEPA) process that will determine the final disposition of the chalet will provide further information regarding the chalet.

**Concern ID:** 51145

**CONCERN STATEMENT:** The EA should note that cultural as well as natural resources will be protected from environmental harm. (Page 6, paragraph 1)

**Response:** The purpose and need for this EA is strictly focused on the protection of the East Fork Quinault River and its related natural processes, resources, and wilderness character. The next NEPA process' purpose and need will focus on the final disposition of the historic structure.

**Concern ID:** 51146

**CONCERN STATEMENT:** The EA should correct the misinformation that the foundation is non historic. The foundation was part of the original construction and dates to 1930. It is because of the foundation that the structure has survived in such good condition since that time. (Page 8, paragraph 1 and all following reference to "non-historic foundation")

**Response:** The EA has been revised to reflect that the foundation is part of the historic structure and not a separate non-historic piece of the structure.

**Concern ID:** 51148

**CONCERN STATEMENT:** The last sentence of the EA's purpose and need section should be rewritten. At present, the document discusses a follow-up analysis "to assess options for the final disposition of the chalet." Use of the term "disposition" implies a specified intent/outcome for the follow-up analysis. We feel a phrase such as "to provide appropriate management of natural

and cultural resources" would be more appropriate. (Page 7, paragraph 1)

**Response:** The word "disposition" was specifically chosen so the reader would understand that this is not the final action. Further action regarding the chalet's presence in the valley will be determined under the next National Environmental Policy Act (NEPA) process.

**Concern ID:** 51154

**CONCERN STATEMENT:** The EA should clarify the level of fluvial geomorphic documentation. Understanding the local micro geomorphic topography was important to protecting the building in 2005. It appears that all the geomorphic analysis has been done from the air at relatively high elevation. Have the geomorphologists been on site in the valley? (Page 6)

**Response:** The National Park Service's Regional Fluvial Geomorphologist was on site in 2005 to assess and project the potential future migration of the river channel.

More recent analysis has been conducted from the air using photographic imagery on a continual two week basis since January 2014, when the river channel shifted after years of flowing further away from the chalet. Using information gathered in 2005, as well as recent aerial and ground-level photographs, the Regional Fluvial Geomorphologist provided an assessment of the erosion hazard posed by the river to the Enchanted Valley Chalet based on the current channel alignment.

**Concern ID:** 51206

**CONCERN STATEMENT:** This problem was identified a decade ago. Please explain the measures taken to stabilize the chalet by each superintendent in the last decade. Please identify how much the preferred alternative for stabilization would have cost a decade ago compared to current costs to stabilize the chalet. If no substantive stabilization methods were attempted in the last decade, please explain why no action was taken.

**Response:** The purpose and need for this EA is focused on the protection of the East Fork Quinault River, not on stabilization of the chalet or riverbank. As noted under the "Background" section in Chapter 1 "Purpose and Need" on page 6 of the EA, "Minor channel work and vegetation manipulation was done by park staff in fall 2005..." The channel migrated away from the chalet by 2006. The measures taken (or not taken) in the past and related costs to stabilize the chalet are not relevant to this EA and are therefore not included here.

The effectiveness of manipulation of the river channel would be limited and potentially short-term given the natural flow and migration of the river. Manipulation of the river channel would require a minimum tool analysis and would likely result in negative impacts on the natural, untrammelled, and undeveloped qualities of wilderness character.

**Concern ID:** 51207

**CONCERN STATEMENT:** I support the Olympic Park Associates' comments submitted on this matter. I have read the EA and find that it did not explain why dismantling the chalet was not a cheaper and less damaging way of keeping the structure out of the river. In short, I did not find sufficient explanation of the alternatives that are available.

**Response:** Dismantling, disassembling, or razing the building in its current location is not feasible because the risk to staff safety is too high given the instability of the river bank, based on analysis by the park's chief of facility maintenance and engineer.

**Concern ID:** 51208

**CONCERN STATEMENT:** The Wilderness Society supports specific actions in the EA and recommends further analyses. The Wilderness Society supports the proposed removal of the non-historic foundation of the chalet for all of the benefits noted in the EA. We also support the proposed position of the National Park Service to not actively manipulate the river channel or bank. Furthermore, as noted on page 20 of the EA, the 100-year floodplain of the river has not been mapped. To accurately evaluate and assess alternatives in future planning efforts, the 100-year floodplain (and ideally 500-year floodplain) should be mapped. History has proved this river to be extremely dynamic, and future recommendations should be made with the best available data.

**Response:** The EA has been revised to reflect that the foundation is not "non-historic" and will remain in place at least until the determination of the final disposition of the chalet is made in the next NEPA process.

The 100-year and 500-year floodplain mapping may occur and be provided in the next NEPA process, if it is determined necessary for inclusion.

**Concern ID:** 51209

**CONCERN STATEMENT:** The EA should note that Enchanted Valley Chalet has been a back country ranger station for at least 60 years and during that time has served as a four season emergency shelter. (Page 6, paragraph 1)

**Response:** The purpose of this environmental assessment (EA) is focused on the protection of the East Fork Quinault River, not on stabilization of the chalet or riverbank. Further background information specifically related to the chalet may be provided in the next National Environmental Policy Act (NEPA) process that will determine the final disposition of the structure.

**Concern ID:** 51210

**CONCERN STATEMENT:** The EA should note that major cyclical maintenance completed on the structure in 2010 resulted in the building being rated in good condition. This effort replaced the roof and repaired rotted logs improving the interior

to provide enhanced seasonal ranger quarters. (Page 6)

**Response:** The purpose and need for this environmental assessment (EA) is focused on the protection of the East Fork Quinault River, not on the stabilization of the chalet or riverbank. Further background information specifically related to the chalet may be provided in the next National Environmental Policy Act (NEPA) process that will determine the final disposition of the structure.

**Concern ID:** 51211

**CONCERN STATEMENT:** The EA should note the extent of local support for preservation of the chalet over the years, including the efforts of Olympians of Aberdeen to raise needed funds and contribute donated labor for extensive maintenance completed in 1983. (Page 6)

**Response:** The purpose of this environmental assessment (EA) is focused on the protection of the East Fork Quinault River, not on stabilization of the chalet or riverbank. Further background information specifically related to the chalet may be provided in the next National Environmental Policy Act (NEPA) process that will determine the final disposition of the structure.

**Concern ID:** 51212

**CONCERN STATEMENT:** The EA should clarify the extent to which the proposed relocation plan has been independently reviewed by appropriate engineers as needed. At least two major repairs have been implemented to the chalet and it would be prudent to assure the proposed relocation plans do not inadvertently damage the chalet during the moving process. (Page 8, paragraph 2 and page 27, paragraph 4)

**Response:** Two engineers and a historical architect are members of the interdisciplinary team involved in the discussions about moving the chalet and they have made determinations about the safety of the structure and the inability of park staff to safely dismantle it in place. Safeguards included in the federal acquisition process will insure that a qualified contractor will be employed, adding an opportunity for independent review and finalization of the plans.

**Concern ID:** 51213

**CONCERN STATEMENT:** The EA should clarify the statement that the building is unsafe for personnel. It is certainly reasonable and prudent to close the building to unnecessary public and staff access, but was this determination of condition made by a structural engineer following an onsite visit by the engineer? (Page 27, paragraph 3)

**Response:** Two engineers and a historical architect are members of the interdisciplinary team involved in the discussions about the safety of the structure. The safety risk is also visually evident given that the bank erosion has undercut the structure by at least 8 feet. Recent reports and photos

from a site visit conducted in June by park staff as well as by the contractor that recently conducted the Historic American Buildings Survey (HABS) and the Historic American Engineering Record (HAER) documentation, have stated that the structure is starting to shift due to differential settlement and vertical movement of the structure.

**Concern ID:** 51214

**CONCERN STATEMENT:** The EA should clarify what actions were taken in 2005. Specifically, it should note that the actual alternative implemented in 2005 did not include construction of additional gravel banks, did not undertake in-stream work and did not employ rip rap. Such actions were ruled out given the uncertainty associated with each. Additionally the 2005 alternative was implemented without the use of helicopters. Thus in 2005, only those actions that would have minimal resource impacts for natural, cultural and wilderness values were employed. (Page 6)

**Response:** The actions that were taken in 2005 are listed in the EA under the "Background" section of Chapter 1 "Purpose and Need," on page 6.

The effectiveness of manipulation of the river channel would be limited and potentially short-term given the natural flow and migration of the river. Manipulation of the river channel would require a minimum tool analysis and would result in negative impacts on the natural, untrammelled, and undeveloped qualities of wilderness character.

Per section 6.3.5 of the NPS Management Policies 2006, "All management decisions affecting wilderness must be consistent with the minimum requirement concept." The section further states, "Administrative use of motorized equipment or mechanical transport will be authorized only if determined by the superintendent to be the minimum requirement needed by management to achieve the purposes of the area, including the preservation of wilderness character and values, in accordance with the Wilderness Act; or in emergency situations involving the health or safety of persons actually within the area." Per section 6.3.7, "The principle of nondegradation will be applied to wilderness management, and each wilderness area's condition will be measured and assessed against its own unimpaired standard. Natural processes will be allowed insofar as possible, to shape and control wilderness ecosystems. Management should seek to sustain the natural distribution, numbers, population composition, and interaction of indigenous species. Management intervention should only be undertaken to the extent necessary to correct past mistakes, the impacts of human use, and influences originating outside of wilderness boundaries." Lastly, section 4.6.6 states, "The Service will manage watersheds as complete hydrologic systems and minimize human-caused disturbance to the natural upland processes that deliver water, sediment, and woody debris to streams...The Service will protect watershed and stream features primarily by avoiding impacts on watershed and riparian vegetation and by allowing natural fluvial processes to proceed unimpeded. When conflicts

between infrastructure and stream process are unavoidable, NPS managers will first consider relocating or redesigning facilities rather than manipulating streams."

**Concern ID:** 51215

**CONCERN STATEMENT:** The EA should clarify the order of events this spring. It would appear that sometime before January 4, 2014, there was a river event that resulted in erosion. Then some time prior to March 13, 2014, there was a second event which undercut the building. Around March 13, the windows and other materials were removed from the building. What actions onsite did the park take between January 4 when the erosion was posted on Facebook and March 13 when the windows, fuel and other materials were removed from the chalet? (Page 6, paragraph 4-5)

**Response:** The EA clarifies the order of events that occurred since the discovery of the river channel's migration in the "Background" section of Chapter 1 "Purpose and Need" on page 6 of the document.

No on-site actions occurred between early January and mid-March because of adverse weather conditions, high river flows, and the need to minimize any potential safety risks on park staff. Off-site but related actions taken during this time included formation of an interdisciplinary team to identify information needs and begin analysis regarding possible actions, responding to public and congressional inquiries regarding the situation, working with regional and other National Park Service staff to determine appropriate actions and level of compliance and documentation necessary, and initial discussions with the State Historic Preservation Office.

### ***Threatened and Endangered Species: Impact of Proposal and Alternatives***

**Concern ID:** 51096

**CONCERN STATEMENT:** Regarding federally listed endangered species, we note that the action would take place during the breeding seasons for threatened spotted owls and marbled murrelets. The mitigation of "having helicopter flights stay at least 120 m above or away from habitat at all times" strikes us as inadequate given the severe noise of helicopter flights in a narrow valley and probable disturbance to nesting birds - - particularly considering the amount of helicopter round-trip flights throughout the more than 20-mile valley from Bunch Field to the project site. The EA's conclusion that the action "would have short- and long-term, negligible to minor, adverse effects on [listed] fish and wildlife and also some beneficial effects" seems optimistic and understates the case.

**Response:** The impacts and mitigation measures related to threatened and endangered species in the EA were written to directly comply with the US Fish and Wildlife Service's (USFWS) Programmatic Biological Opinion for Olympic National Park (2008-2012; as extended to December 31, 2014).

Park staff has conducted informal consultation with the USFWS and USFWS has reviewed the EA, specifically the impacts and mitigation measures regarding threatened and endangered species, and has provided formal concurrence with the analysis and mitigation measures as detailed in the EA. The concurrence request and response letters can be found in Appendix J in the EA.

### ***Visitor Use and Experience: Impact of Proposal and Alternatives***

**Concern ID:** 51128

**CONCERN STATEMENT:** Washington Trails Association would like to see the adverse impacts to visitors enjoying a wilderness experience to Enchanted Valley kept to a minimum during the busy summer hiking season. However Washington Trails Association also acknowledges that the work must be completed before heavy winter rains further erode the riverbank, which will likely collapse the chalet into the river.

**Response:** Mitigation measures to address potential adverse impacts on visitors are identified under the "Visitor Use and Experience," "Wilderness Resources," "Soundscapes," and "Park Operations" topic areas in the "Mitigation and Monitoring" section of Chapter 2 "Description of the proposed action" of the EA on page 11.

### ***Wilderness: Guiding Policies, Regulations, Laws***

**Concern ID:** 51092

**CONCERN STATEMENT:** Certainly, the location of the action in designated wilderness in a remote and scenic valley along a popular trail raises questions regarding the heavy use of helicopters (up to four hours a day for multiple days) as well as use of a ten-horsepower gas-powered engine to drive pumps for an unspecified amount of time. Both call for a fuller consideration of alternatives than this EA affords.

**Response:** Per Section 4(c) of the Wilderness Act, "Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area."

In accordance with the Wilderness Act and NPS Management Policies, a minimum requirement analysis has been conducted for the action of

moving the structure and can be found in Appendix I of the environmental assessment (EA).

**Concern ID:** 51103

**CONCERN STATEMENT:** I am distressed and disappointed with the Park Service's (NPS) proposal to once again deemphasize the goals of congressionally designated Wilderness, in favor of human structures and related mechanized activities within said Wilderness. Institutional memory is apparently short, as it was just a decade ago that a federal judge ruled the NPS had violated the 1964 Wilderness Act in its attempt to helicopter in and install two new, pre-fabricated shelters at Low Divide and Home Sweet Home. Please explain how the proposal to relocate the Enchanted Valley chalet, with multiple helicopter flights and use of other machines in designated Wilderness, differs in any meaningful respect from this previous ruling.

**Response:** Per Section 4(c) of the Wilderness Act, "Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area." In accordance with the Wilderness Act and NPS Management Policies, a minimum requirement analysis has been conducted for the action of moving the structure and can be found in Appendix I of the environmental assessment (EA).

The 2005 lawsuit regarding the construction and proposed installation of replacement shelters at Home Sweet Home and Low Divide shelters was related to new construction and the use of a helicopter to transport newly constructed facilities into designated wilderness. The action identified in this EA is to move an existing structure 50-100 feet from where it is currently located to protect the East Fork Quinault River from environmental harm. If the structure were allowed to fall into the river it could break into pieces small enough to be carried downstream by the river, it could break into pieces large enough to dam a canyon located just downstream of Enchanted Valley, or cause an unnatural shift in natural river migration. These actions would all have an adverse effect on the natural, untrammelled, and undeveloped qualities of wilderness character.

Dismantling, disassembling, or razing the building in its current location is not feasible because the risk to staff safety is too high given the instability of the river bank. The next NEPA process will determine the final disposition of the structure and what tools and methods will be employed to carry out that action, whatever it may be.

**Concern ID:** 51113

**CONCERN STATEMENT:** Another option would be to bring in by helicopter large round river rock from outside the park and placed at critical points along the river bank could redirect the river away from the chalet.

**Response:** The EA presents minimal river manipulation as well as more extensive river channel manipulation alternatives under the "Alternatives Considered but Not Analyzed Further" section on pages 11 and 12. These alternatives are out of the scope of the analysis because they do not meet the purpose and need of the project, are technically or economically infeasible, or are not within law and NPS policy.

The effectiveness of manipulation of the river channel would be limited and potentially short-term given the natural flow and migration of the river. Manipulation of the river channel would require a minimum tool analysis and would result in negative impacts on the natural, untrammled, and undeveloped qualities of wilderness character.

Per section 6.3.5 of the NPS Management Policies 2006, "All management decisions affecting wilderness must be consistent with the minimum requirement concept." The section further states, "Administrative use of motorized equipment or mechanical transport will be authorized only if determined by the superintendent to be the minimum requirement needed by management to achieve the purposes of the area, including the preservation of wilderness character and values, in accordance with the Wilderness Act; or in emergency situations involving the health or safety of persons actually within the area." Per section 6.3.7, "The principle of nondegradation will be applied to wilderness management, and each wilderness area's condition will be measured and assessed against its own unimpaired standard. Natural processes will be allowed insofar as possible, to shape and control wilderness ecosystems. Management should seek to sustain the natural distribution, numbers, population composition, and interaction of indigenous species. Management intervention should only be undertaken to the extent necessary to correct past mistakes, the impacts of human use, and influences originating outside of wilderness boundaries." Lastly, section 4.6.6 states, "The Service will manage watersheds as complete hydrologic systems and minimize human-caused disturbance to the natural upland processes that deliver water, sediment, and woody debris to streams...The Service will protect watershed and stream features primarily by avoiding impacts on watershed and riparian vegetation and by allowing natural fluvial processes to proceed unimpeded. When conflicts between infrastructure and stream process are unavoidable, NPS managers will first consider relocating or redesigning facilities rather than manipulating streams."

**Concern ID:** 51135

**CONCERN STATEMENT:** "Impacts on the Qualities of Wilderness Character" analysis fails to acknowledge that historic value is a Wilderness value, and that loss of the

Chalet would have a major, long-term adverse impact on this value.

**Response:** Moving the structure 50-100 feet is not a major long-term adverse impact per the intensity thresholds for each level of intensity based on Section 106 of the National Historic Preservation Act (see Chapter 3 "Affected Environment and Environmental Consequences," pages 25-27). The impacts on the structure are analyzed under the "Historic Structure" impact topic under the "Cultural Resources."

The analysis states that moving the structure would result in a long-term, moderate, adverse effect due to the change in location of the national register listed historic structure. This level of impact was made possible through early consultation with the Keeper of the National Register of Historic Places (NRHP) and the State Historic Preservation Office, both of which helped park staff identify appropriate mitigation measures. Without these measures, the action would have resulted in a long-term, major, adverse effect and would have caused the structure to lose its listing on the NRHP.

**Concern ID:** 51216

**CONCERN STATEMENT:** Relocation of the chalet is a clear violation of the Wilderness Act. But perhaps even worse than that, it's another of many recent examples of federal managers caving in to a mob mentality, wherein certain "hobbyists" and/or commercial interests attain sufficient volume to persuade federal agencies to willingly violate long-established law. By all appearances, the NPS's decision to defer to those who feel eternal preservation of the chalet is worthy of degrading Wilderness reflects a desire by our land managers to not make the tough call. It's cowardice, really, on the part of NPS management; and a refusal to act on behalf of the public at large, as well as designated Wilderness specifically, so as to avoid having a certain noisy contingent say mean things about them. It smacks of careerism, rather than leadership.

**Response:** First and foremost, in any undertaking, is staff safety. Dismantling, disassembling, or razing the building in its current location is not feasible because the risk to staff safety is too high given the instability of the river bank. Moving the structure from the bank provides immediate protection of the East Fork Quinault River. The next National Environmental Policy Act (NEPA) process allows time to make a determination on the final disposition of the structure. Whatever that determination may be, its implementation will likely present significantly lower risk to staff safety than attempting any action while the structure is in its current location and condition.

**Concern ID:** 51217

**CONCERN STATEMENT:** Although channel migration seems to be inevitable in the valley floor, I would like to consider causing the river to migrate according to where park officials can determine how to preserve the remaining meadow. The course

that the river is taking now is wild. Can the 2006 course be re-established with minimal short term impacts to all aspects of the observed criteria? I would not be opposed to disturbing and/or depositing material to permanently establish the 2006 course which could protect the surviving meadows and what lies in them. A short term disturbance in this regard would have greater long term benefits. The elevations and former river channels prove that the river should be running straight through the valley and not winding its way around every nook and cranny. Have the effects of the streams flowing from the Burke Range above the valley to the west been considered? It seems that where one of the main streams is flowing into the river is where the river has decided to run in an easterly direction rather than maintaining its natural southwesterly flow. An aggressive channel manipulation might be in order, and one I would like the Park to consider. Prohibited uses according the Wilderness Act would need to be used. But, I believe we have a responsibility to do what we can to protect the wilderness. If manually manipulating the river will preserve the meadows and remaining deciduous trees there then so be it. I understand that I am talking about cultural versus natural processes and that may be against Park policy and procedures but I do believe the river needs to be sent back to its original location. However, the health of the river is best if it flows as straight as possible through the valley and remain as a vibrant natural resource for all life downstream. Thinking in terms of preserving the valley meadows by relocation of the river course would however be consistent with the Wilderness goals of revegetating highly impacted areas if the overall use of the meadow is considered. It may be a stretch to think of this to be consistent with Wilderness practices but I also took pictures of people walking on the trails in the meadow. There is a need to maintain the meadow for many reasons, including that is where the trails are. The river has already changed the course of routes at the south end of the valley.

***Response:***

The EA presents minimal river manipulation as well as more extensive river channel manipulation alternatives under the "Alternatives Considered but Not Analyzed Further" section on pages 11 and 12. These alternatives are out of the scope of the analysis because they do not meet the purpose and need of the project, are technically or economically infeasible, or are not within law and NPS policy. Manipulation to the river channel would have long-term adverse impacts on the natural, untrammeled, and undeveloped qualities of wilderness character.

Per section 6.3.5 of the NPS Management Policies 2006, "All management decisions affecting wilderness must be consistent with the minimum requirement concept." The section further states, "Administrative use of motorized equipment or mechanical transport will be authorized only if determined by the superintendent to be the minimum requirement needed by management to achieve the purposes of the area, including the preservation of wilderness character and values, in accordance with the Wilderness Act; or in emergency situations involving the health or safety of persons actually within the area." Per section 6.3.7, "The principle of nondegradation will be applied to wilderness management, and each

wilderness area's condition will be measured and assessed against its own unimpaired standard. Natural processes will be allowed insofar as possible, to shape and control wilderness ecosystems. Management should seek to sustain the natural distribution, numbers, population composition, and interaction of indigenous species. Management intervention should only be undertaken to the extent necessary to correct past mistakes, the impacts of human use, and influences originating outside of wilderness boundaries." Lastly, section 4.6.6 states, "The Service will manage watersheds as complete hydrologic systems and minimize human-caused disturbance to the natural upland processes that deliver water, sediment, and woody debris to streams...The Service will protect watershed and stream features primarily by avoiding impacts on watershed and riparian vegetation and by allowing natural fluvial processes to proceed unimpeded. When conflicts between infrastructure and stream process are unavoidable, NPS managers will first consider relocating or redesigning facilities rather than manipulating streams."

River migration is a natural process and the East Fork Quinault River is migrating naturally within the valley. This process affects and is affected by other natural resources and natural processes such as avalanches, landslides, and flood events. National Park Service actions must be in accordance with existing law and policy. In this case, both the Wilderness Act and NPS Management Policies preclude river channel manipulation.

**Concern ID:** 51218

**CONCERN STATEMENT:** While the Wilderness Act is a legal law and a guide to maintain the wilderness aspect "where a man visits, leaving only footprints" in such an area, it is also a legislatively written law of morals and obligations expressed within that act to maintain historical structures within any such defined wilderness area. This aspect of the Wilderness Act therefore specifically requires the Olympic National Park Service to maintain the structure defined as the Enchanted Valley Chalet.

**Response:** Neither the Wilderness Act, nor the National Historic Preservation Act requires that any historic structure be maintained.

**Concern ID:** 51219

**CONCERN STATEMENT:** I support the effort to move the Enchanted Valley Chalet away from the river. Like the Green Mountain Lookout near my hometown (recently saved by a unanimous vote by the House and Senate) the Chalet is part of the fabric of the Olympic Wilderness and its potential loss would impact the character of the wilderness. So few of these structures remain in our National Parks and Forests, that I feel it is imperative to do what we can to protect, at least, those listed properties. The use of motorized equipment on this project is warranted as this action is time critical. Use of the light helicopter will allow the crew to complete the project safely.

As a listed Historic Property, I feel that the Minimum Requirement Analysis

should also have addressed the wilderness character of the Chalet as an "Other Feature of Value" per the current interagency MRDG process. I look forward to seeing this discussion in the next phase of this process.

**Response:** The impacts on the structure are analyzed under the "Historic Structure" impact topic under "Cultural Resources" on pages 25-28 in the EA.

### ***Wilderness: Impact of Proposal and Alternatives***

**Concern ID:** 51097

**CONCERN STATEMENT:** As the EA accurately points out, "the chalet was added to the National Register of Historic Places due to its local significance" [p. 26]. Nothing in the National Historic Preservation Act requires that the structure be preserved. Olympic National Park and the Olympic Wilderness are of national significance and worldwide renown. As you know, the Wilderness Act defines wilderness as an area "of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable..." It strikes OPA that the "imprint of man's work" in the form of a repositioned three-story building a new location in the spectacular Enchanted Valley would be strikingly noticeable. And it would diminish wilderness character.

**Response:** The structure currently exists in the designated wilderness within the Enchanted Valley, and currently has an adverse effect on the natural and undeveloped qualities of wilderness character. The effects on wilderness character of the continued presence of this structure will not be changed with the temporary repositioning of the structure 50-100 feet from its current location.

**Concern ID:** 51220

**CONCERN STATEMENT:** In nearly all instances, Wilderness Watch opposes extraordinary efforts to save buildings and structures in designated Wilderness. Buildings, structures, and installations are prohibited by the 1964 Wilderness Act (16 U.S.C. 1131-1136). The very essence of a Wilderness "untrammelled by man", as the Wilderness Act defines it, also means that humans should not manipulate Wilderness nor impose human will upon Wildernesses. Wilderness Watch believes that allowing the forces of nature to weather and reclaim buildings and structures in Wilderness is what the Wilderness Act directs us to do. These same general values and requirements under the Wilderness Act also apply specifically to the Enchanted Valley Chalet.

The National Park Service has an obligation to adhere to the requirements of the Wilderness Act. If the Olympic Wilderness reclaims the chalet by natural processes, the wilderness character of the area will not be

degraded, as the EA states, but will be improved by the absence of a human-built building.

**Response:**

This EA for the "Emergency Action to Temporarily Relocate the Enchanted Valley Chalet for the Protection of the East Fork Quinault River" analyzes the temporary relocation of the chalet to protect the river from imminent environmental harm. If the structure were allowed to fall into the river it could break into pieces small enough to be carried downstream by the river, it could break into pieces large enough to dam a canyon located just downstream of Enchanted Valley or cause an unnatural shift in natural river migration. These actions would all have an adverse effect on the natural, untrammled, and undeveloped qualities of wilderness character and would violate the Wilderness Act.

Its current location also does not allow park staff to safely dismantle and remove the structure. The subsequent NEPA process will analyze various alternatives toward a final determination on disposition of the chalet. This determination could not be analyzed in the current "concise" EA which is being conducted under special authority from DOI to address the immediate threat of resource damage caused by the chalet collapsing into the river. The final determination of the structure requires a much more comprehensive analysis that could not be conducted in the short timeframe given the need for the emergency action in the "concise" EA.

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