

PEPC 191198  
**JEFFERSON COUNTY  
DEPARTMENT OF PUBLIC WORKS**

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*Frank Gifford, Public Works Director  
Monte Reinders, P.E., County Engineer*

**RECEIVED**

**OCT - 4 2006**

**DSC-P**

September 25, 2006

Olympic National Park General Management Plan  
National Park Service  
Denver Service Center  
PO Box 25287  
Denver, Colorado 80225

RE: Comments on Draft Olympic National Park General Management Plan

Dear Sir or Madam:

Thank you for the opportunity to comment on the Draft Olympic National Park General Management Plan (GMP).

The Jefferson County Commissioners commented on the scope of the GMP in a letter dated October 16, 2001. (See attachment.) They noted that Jefferson County Roads, including the Upper Hoh Road, Oil City Road, and Quinault South Shore Road, are important access routes to the Park and serve primarily Park users. Segments of these roads are within floodplains and riparian corridors. In recent years segments of these roads have been damaged or destroyed numerous times by flooding, river channel migration, and geologic instability.

Jefferson County may not have the financial resources available in the future to reopen these roads when significant damage occurs. The County's Department of Public Works has a small engineering and project management staff. Conducting emergency repairs to reopen these roads presents significant challenges to the Department. On several occasions the only feasible option to reopen the roads has been to rebuild them in the river channel using heavy rock bank protection. This type of repair may become less viable in the future due to heightened concern over impacts to the natural environment and threatened/endangered species. These factors create significant potential that these roads could be closed indefinitely or even permanently. This would not be acceptable to the National Park Service, Park users, or Jefferson County.

Preparation of the GMP is an opportunity for all affected agencies, including the National Park Service, Federal Highway Administration, State of Washington, and Jefferson County, to develop a plan for addressing these issues. The Jefferson County Commissioners

therefore requested that the GMP address the following specific issues related to Park access over County Roads:

- Assess the existing access routes and identify areas that are at risk due to flooding, river migration, geologic stability, and other factors;
- Identify appropriate alternative routes for relocating these roads;
- Identify appropriate agencies responsible for the design and construction of alternative routes and the ongoing maintenance and repair of the Park access roads; and
- Identify Federal funds for relocation, maintenance, and repair of these roads.

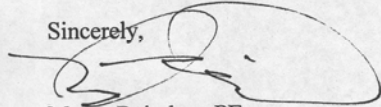
After review of the Draft GMP, the Public Works Department has concluded that the GMP does not address these issues.

The GMP Alternatives address the issues of Park roads and facilities in flood plains, riparian corridors, and geologically unstable areas within the Park. Preferred Alternative D states "Roads might be modified or relocated for resource protection and/or to maintain vehicular access...." (Page 68.) Alternatives C and D propose modifications to visitor access, including moving access roads out of the river meander zone. Alternatives B, C, and D consider relocating the Hoh Rain Forest Visitor Center adjacent to the Park boundary or outside of the Park, because of potential damage to the Hoh River Road within the Park. Yet these alternatives do not address impacts to Park access from damage to the Upper Hoh County Road outside of the Park. Alternatives B, C, and D propose to maintain the Quinault Lake Loop, yet they ignore the issue of maintaining the 4.1-mile Quinault South Shore County Road segment of that loop.

The GMP fails to consider that proposed actions to maintain access within the Park would be negated if County Roads providing access to the Park are damaged or destroyed and Jefferson County is unable to repair or relocate them. The GMP fails to address the need to plan for, finance, and relocate vulnerable County Roads that provide Park access.

I strongly urge the Park Service to revise the GMP to address these issues as requested by the Jefferson County Board of Commissioners in their letter of October 16, 2001.

Sincerely,



Monte Reinders, PE  
Jefferson County Engineer

Cc: Jefferson County Board of Commissioners  
John Fishbach, County Administrator  
Frank Gifford, Public Works Director



1820 Jefferson Street  
P.O. Box 1220  
Port Townsend, WA 98368

Dan Titterness, District 1   Glen Huntingford, District 2   Richard Wojt, District 3

October 16, 2001

National Park Service  
Denver Service Center  
Planning and Design Services, Cliff Hawkes  
PO Box 25287  
Denver, Colorado 80225-9901

RE: Olympic National Park General Management Plan

Dear Sir:

Thank you for the opportunity to participate in the Olympic National Park's General Management Plan.

A significant portion of the Olympic National Park is located within Jefferson County. Some of the most important Park access roads are County Roads, including the Upper Hoh Road, Oil City Road, and Quinault South Shore Road. Some segments of these roads are within the riparian corridor of these rivers. Some segments also adjoin Wilderness Areas. In recent years these roads have been closed numerous times due to flooding, migration of the river channel, and geologic instability. On several occasions the County's only feasible option to reopen the roads has been to rebuild them in the river channel using heavy rock bank protection. This type of repair may no longer be an option due to the requirements of the Endangered Species Act and concerns by Native American Tribes that these activities may impact treaty fisheries resources.

There is a significant possibility that one or more of these roads could be closed and there would not be an environmentally acceptable solution to reopen them in a timely manner. This is obviously not an acceptable situation for Jefferson County, the National Park Service, or Park users.

Repairing damage to Park access roads has significantly depleted the County's Road Fund and impacted the County's ability to fund other County Road projects. Because the County's Department of Public Works has a relatively small engineering and project management staff, conducting emergency repair work on these roads has also diverted the Department's personnel from other priority County projects.

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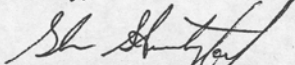
It is neither fair nor prudent for the Park Service to continue to rely on the capacity of Jefferson County to maintain these access roads. Preparation of the Park General Management Plan is the ideal opportunity for all affected agencies, including the Park Service, Federal Highway Administration, the State of Washington, and Jefferson County, to assess this situation and develop appropriate solutions.

In order to achieve this goal, the Management Plan should address the following specific issues related to Olympic National Park access over Jefferson County Roads:

- ◆ Assess the existing access road routes and identify areas that are at risk due to flooding, river migration, geologic stability, and other factors
- ◆ Identify appropriate alternative routes for relocating these roads
- ◆ Identify appropriate agencies responsible for the design and construction of alternative routes and the ongoing maintenance and repair of the Park access roads
- ◆ Identify Federal funds for relocation, maintenance, and repair of these roads

We look forward to discussing these issues with the Park Service during the development of the Management Plan.

Sincerely,

  
Glen Huntingford, Chairman

cc: Senator Patty Murray  
Representative Norm Dicks