FINDING OF NO SIGNIFICANT IMPACT

HOH RIVER VALLEY ROAD, WEST TWIN CREEK BRIDGE

Olympic National Park, Washington
July 2007

This finding of no significant impact (FONSI) and the environmental assessment (EA) constitutes the record of the environmental impact analysis and decision-making process for this development project. The National Park Service (NPS) will implement the Preferred Alternative—construction of West Twin Creek Bridge, the environmentally preferred alternative as described in the Olympic National Park (ONP or park) EA to restore access along the Hoh River Valley Road into the Hoh Rain Forest Area.

PURPOSE AND NEED FOR FEDERAL ACTION

The purpose of the proposed project is to protect and restore natural resource functions, while restoring permanent two-lane access along Upper Hoh Road and preserving for the benefit, use, and enjoyment of the people, convenient access to the Hoh Rain Forest. The proposed project has several objectives:

- Reestablish two-lane access for park visitors and staff to the Hoh Rain Forest, Hoh Visitor Center, campground, picnic area, and trails
- Restore natural hydrologic conditions to West Twin Creek
- Provide fish passage along West Twin Creek

The proposed project is needed to repair damage to the Upper Hoh Road—West Twin Creek crossing caused by storm damage in November 2006. Restoration of access to the Hoh Rain Forest is of vital concern to the NPS, local and regional communities, and park visitors.

SELECTED ALTERNATIVE

The Preferred Alternative—the construction of a bridge on the Upper Hoh Road across West Twin Creek is the selected alternative.

The Preferred Alternative consists of three independent elements: 1) constructing a new bridge across West Twin Creek, 2) removing the temporary bridge, and 3) removing the washed-out culverts from the streambed. Although each project element is independent of the other, they will be undertaken as one project under the Preferred Alternative.

The new bridge will be about 115 feet long, with two 14-foot-wide lanes. The bridge will consist of prefabricated concrete girders placed on concrete bridge abutments with concrete-filled steel pipe pile footings. The bridge design allows for natural streamflow passage to occur, as well as passage of a 100-year flood. The bridge will be economical

and will allow for conventional construction methods to be used while minimizing impacts to the environment. The design also provides acceptable aesthetics, safe and efficient traffic flow, ease of maintenance, and adequate design life. The proposed bridge could be constructed within a small area of disturbance using readily available construction materials.

Upon completion of the roadway and bridge, the temporary bridge will be removed and dismantled. The riprap and temporary bridge abutment will be removed and the project area will be stabilized and revegetated. Riprap removed from the temporary bridge abutment will be used to armor the slopes beneath the new bridge. The gravel/pavement on the detour road will be removed and reclaimed. The asphalt layer of the temporary roadway will be disposed of outside the park boundary. The gravel and rock material from the temporary road and any excess riprap from the temporary bridge abutment will be salvaged and stored for other uses in the park.

The two corrugated metal culverts that were washed downstream during the storm will be removed from the stream channel prior to bridge construction using a large tracked excavator. The culverts could likely be removed without diverting the stream because they are currently located out of the flow, and streamflow will be low in September and October when the work will be done. Installation of water-diversion measures to move streamflow out of the work area will be used depending on conditions at the time of work. The operator will excavate around the culvert and dismantle the culvert into smaller sections as necessary. Each piece of culvert will be transported back to Upper Hoh Road where it will be loaded onto a truck for removal from the park.

The selected alternative was not significantly modified due to public comment.

ALTERNATIVES CONSIDERED AND ANALYZED

In addition to the selected alternative, the EA considered a No Action Alternative.

Under the No Action Alternative, the existing temporary bridge will remain in place indefinitely. Traffic will continue to use the one-lane bridge to access facilities and areas of the park up the Hoh River Valley. Because the bridge is not a permanent structure and is not permanently anchored to the banks, it would require frequent regular maintenance and may be more subject to washing out during floods.

When emergency repairs were made to install the temporary bridge, riprap was placed on the streambanks to create a stable location for the temporary bridge. Under the No Action Alternative, the riprap would remain in place. The washed-out culverts would not be removed and would remain an unnatural influence on stream hydrologic conditions.

Under the No Action Alternative, West Twin Creek would remain passable to fish, one of the purposes of the project, although the washed-out culverts would impede fish movement. The other project purposes of reestablishing permanent two-lane access to

facilities and areas of the park and restoring natural hydrologic stream conditions would not be met under the No Action Alternative.

ALTERNATIVES CONSIDERED AND REJECTED

Reconstruct Road Using Culverts

Under this alternative, the temporary crossing would be replaced with a two-lane culvert crossing similar to the washed-out crossing. The temporary bridge would be removed and the washed-out culverts would be retrieved from downstream. This alternative was eliminated from detailed analysis because it does not meet the project purposes, including the restoration of fish passage at West Twin Creek. Although two-lane access would be restored, the culverts would be subject to washing out in future storm events. Natural hydrologic conditions would not be restored and West Twin Creek would become impassable for fish.

Close Upper Hoh Road at West Twin Creek

Under this alternative, the temporary bridge and riprap would be removed and Upper Hoh Road would be closed at the milepost 1 parking area where a steel gate is currently located. Existing facilities such as the ranger station/visitor center, maintenance shop, and campground would be inaccessible by vehicle. West Twin Creek would remain passable for fish. This alternative was eliminated from further analysis. While this alternative would meet the project objective of providing fish passage and restoring natural hydrologic stream conditions, it does not meet the project purpose of providing permanent two-lane access to the Hoh Rain Forest and park facilities.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The "environmentally preferred" alternative is determined by applying the criteria cited in the National Environmental Policy Act of 1969 (NEPA), and applied in accord with the Council on Environmental Quality (CEQ) regulations. The CEQ provides direction that "[t]he environmentally preferred alternative is the alternative that would promote the national environmental policy as expressed in section 101 of NEPA, which considers:

1. Fulfilling the responsibilities of each generation as trustee of the environment for succeeding generations.
2. Assuring for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings.
3. Attaining the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.
4. Preserving important historic, cultural, and natural aspects of our national heritage and maintaining, wherever possible, an environment that supports diversity and variety of individual choice.
5. Achieving a balance between population and resource use that would permit high standards of living and a wide sharing of life's amenities.

6. Enhancing the quality of renewable resources and approaching the maximum attainable recycling of depletable resources" (NEPA, section 101).

The NPS is required to identify the environmentally preferred alternative(s) for any of its proposed projects. In essence, the environmentally preferred alternative would be the one(s) that "causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (Department of Interior (DOI), 2001a).

While the No Action Alternative would preserve existing conditions, it would not be considered the Environmentally Preferred Alternative because allowing the temporary bridge to remain in place would not meet the goals of providing the widest range of beneficial uses without degradation and risk of health or safety. The No Action Alternative is not the Environmentally Preferred Alternative for the following reasons: (1) implementing this alternative would not improve road safety; (2) this alternative would not allow park managers to effectively preserve and maintain park resources and facilities in the Hoh River Valley because access would be restricted to the one-lane temporary bridge; (3) maintaining the temporary bridge at higher levels than required for a permanent structure would continue to require resource materials (e.g., riprap and road base); and (4) there is a higher likelihood the temporary bridge would not withstand large flood events, which would result in road closure, making it more difficult for visitors and staff to access the park complex. Thus, the No Action Alternative would not meet goals 2, 3, 5, or 6.

The NPS determined that the Environmentally Preferred Alternative is to construct a new bridge at West Twin Creek because it surpasses the other alternative in realizing the full range of NEPA goals as stated in § 101 of NEPA. Constructing a new bridge at West Twin Creek is the Environmentally Preferred Alternative because it would provide the widest range of beneficial uses without degradation, and would reduce risks to health and safety because it would provide sustainable vehicular access to the facilities and trailheads in the Hoh River Valley. Implementing the Preferred Alternative would best preserve the natural aspects of West Twin Creek and its floodplain as compared to the No Action Alternative because it better restores natural hydrologic stream conditions and would provide for fish passage in West Twin Creek (goals 1 and 4). Constructing the bridge to pass the 100-year flood event would allow for more unimpeded access (i.e., fewer road closures due to bridge washouts) to the recreational opportunities in the Hoh River Valley (goals 2, 3, and 5). The Preferred Alternative provides for the reuse of riprap and other materials that were used to install the temporary bridge (goal 6).

WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

The following summary reviews impact considerations and highlights key safeguards of implementing the Preferred Alternative, the selected alternative. Mitigation measures described in Table 1 will be employed to minimize these impacts during and after completion of the proposed project. The EA provides for detailed consideration of the factors supporting the determination of non-significance.

Vegetation: Project activities will occur primarily within the existing roadway and areas of existing disturbance. The project will restore vegetation on about 0.4 acre following removal of the detour road to the temporary bridge. Revegetation and weed-control measures will also be used in reclamation of areas disturbed by bridge construction and removal of the temporary bridge. Minor vegetation damage will occur from access and removal of the washed-out culverts located downstream from the bridge site.

Wildlife: The project will not result in the loss of wildlife habitat. Minor adverse effects to wildlife could occur from human presence and noise during construction. There will be no long-term change in traffic or other activities not previously present along the road that will impact wildlife.

Fishery Resources (including threatened bull trout): Replacement of the washed-out culverts with a new bridge will allow salmon, trout, and other fish, including federally listed bull trout populations, to freely migrate and access approximately 2 miles of high-quality fish habitat upstream from the road crossing. Construction of the permanent bridge, removal of the temporary bridge, and culvert removal will likely generate short-term erosion and sediment transport to West Twin Creek until the site is stabilized, which could have a short-term negligible adverse effect on aquatic life. Overall, there will be long-term beneficial effects to fish from restoring hydrologic and ecological functions to West Twin Creek by construction of a permanent bridge designed to withstand a 100-year flood, stabilization of the streambanks, and removal of the washed-out culverts from the stream.

Special Status Species. The northern spotted owl is not known to occur in the vicinity of the project area and no suitable habitat will be modified or removed. The project will start September 1, during the late breeding season (after July 15), when breeding owls and their young are less vulnerable to disturbance. Foraging owls may be disturbed by machinery noise during construction, causing owls to temporarily avoid the project area. No suitable bald eagle habitat will be lost and no perching, roosting, or nesting sites will be modified or removed as a result of the project. The work will occur outside of bald eagle nesting and wintering seasons, and bald eagles are not known to nest in the project area. The project will occur near suitable habitat for marbled murrelets, but will not result in any loss of identified habitat. To avoid adverse impacts to breeding murrelets, construction activities will not begin until September 1, during the murrelet late breeding season (August 6 to September 15). Construction-related noise and activity could result in short-term adverse effects to murrelets.

See previous section, *Fisheries Resources* for bull trout discussion.

The project may affect, but is not likely to adversely affect, northern spotted owls, marbled murrelets, and bull trout, and will have no effect on bald eagles.

Soils: No vegetation clearing is required and affected soils are primarily within existing disturbed areas. Productivity of about 0.4 acre of soils under the detour road to the temporary bridge will be restored. Construction of a new bridge, removal of the temporary bridge, and culvert removal will result in temporary soil disturbance that will likely generate short-term erosion and sediment transport in West Twin Creek until the site stabilizes. Revegetation of disturbed areas will stabilize soils and removal of the washed-out culverts will substantially reduce the potential for unnatural erosion or deposition in the stream over the long term.

Hydrology and Water Quality: West Twin Creek will be temporarily disturbed during preparation and installation of the bridge abutments, placement of the riprap, removal of the temporary bridge, and removal of the washed-out culverts. The stream will be diverted during bridge construction, but will flow naturally, without impedance, after construction is completed. The new bridge will be designed to accommodate natural streamflows, as well as 100-year flood flows, which will reduce the potential for future storm-related damage. Removal of the washed-out culverts will restore natural streamflow and function.

***Floodplain*:** Installation of a permanent bridge that will span the entire creek channel will be beneficial to floodplain flow because it will allow unrestricted flows up to the 100-year peak flow under the bridge. Removal of the washed-out culverts will also be beneficial to West Twin Creek and the Hoh River floodplains.

Visitor Experience and Public Use: The project will reopen permanent two-lane vehicle access to the trailheads, campground, and visitor center. The Preferred Alternative will improve vehicle access, thus improving the visitor experience and public use. Recreational resources, such as the trails at Hoh Rain Forest and campground, will remain readily accessible, resulting in beneficial effects to visitor use.

Park Operations: The project will allow unimpeded vehicle access into the Hoh Rain Forest portion of the park at the end of Upper Hoh Road, which will allow a more effective NPS response to medical emergencies, search and rescue, and fires, and will also improve access for research, resource management, and facility and trail maintenance. Maintenance operations will continue on Upper Hoh Road and in the developed area without traffic delays. The proposed bridge will be a permanent structure requiring less-frequent maintenance and traffic signal lights will not be needed.

Socioeconomics: Short-term traffic delays during construction could discourage or affect tourism-related spending, but work will be conducted in the off-peak season. Construction of a permanent bridge will result in long-term benefits to the local gateway

communities by ensuring access to one of the most popular visitor destinations on the Olympic Peninsula, the Hoh Rain Forest. Short-term construction-related employment and material purchases will have a short-term beneficial economic effect.

Cumulative Impacts: For the purposes of this analysis, the projects selected for the cumulative impact analysis have occurred in the past, are underway, or may occur in the reasonably foreseeable future.

When combined with the effects of past and present planned actions, the proposed project will have regional short- and long-term, minor to moderate, adverse and beneficial impacts on area resources. Since the Preferred Alternative will result in minor impacts overall, it will not substantially contribute to the overall cumulative effects of past, present, and future planned actions in the project area.

BASIS FOR DECISION

The Preferred Alternative is the selected course of action. The project could be implemented without any major adverse impacts to vegetation, wildlife, fisheries resources, special status species, soils, hydrology and water quality, floodplains, visitor experience and public use, park operations, and socioeconomics.

There were no highly controversial effects identified during either the preparation of the environmental assessment or the public review period, and the impact analysis has not been highly debated. The nature of this project is such that it does not involve highly uncertain, unique, or unknown risks. The available information on which to base this decision is adequate.

The selected actions are not directly related to any larger proposal. The project does not establish a precedent or constrain any future considerations of use in the area. The NPS followed required compliance processes to ensure that this project does not violate any federal, state, or local environmental protection laws or requirements.

Mitigation Measures

Mitigation measures have been incorporated into the selected alternative to avoid or reduce impacts as part of the proposed project. All mitigation measures are summarized in Table 1 below.

Table 1. Mitigation Matrix.

Resource Area	Mitigation	Responsible Party
General Considerations	Construction zones will be identified and fenced with construction tape, snow fencing, or some similar material prior to any construction activity. The fencing will define the construction zone and confine activity to the minimum area required for construction. All protection measures will be clearly stated in the construction specifications and workers will be instructed to avoid conducting activities beyond the construction zone as defined by the construction zone fencing. Temporary erosion- and sediment-control Best Management Practices (BMPs) such as silt fences, plastic covers, waddles (a biodegradable material used for sediment control), and other material, will be in place to minimize sedimentation, turbidity, and treat stormwater runoff impacts from construction activities. Silt fencing fabric will be inspected daily during project work and weekly after project completion, until the time it is removed. Accumulated sediments will be removed when the fabric is estimated to be approximately 75% full. Silt removal will be accomplished in such a way as to avoid introduction into any flowing water bodies. Although soil side-cast during construction will be susceptible to some erosion, such erosion will be minimized by placing silt fencing around the excavated soil. Excavated soil may be used in the construction project; excess soil will be stored in approved areas outside the 100-year flood mark. Construction equipment staging will occur within the roadway for active work areas or at designated turnouts. All tools, equipment, barricades, signs, surplus materials, and rubbish will be removed from the project work limits upon project completion.	FHWA Project Inspector, NPS Project Supervisor
Vegetation	Disturbed soils will be replanted with either sterile grass seed, native grass seed, or materials removed from the project area prior to work for later replacement as soon as possible following disturbance. Disturbed soils will be susceptible to erosion. Riparian vegetation will be planted as soon as possible to minimize sedimentation associated with bare ground. This will reduce construction scars and erosion. Topsoil and/or duff will be salvaged and conserved at the beginning of construction and spread over disturbed areas as close to the original location as possible, and supplemented with scarification, mulching, seeding, and/or planting with species native to the immediate area. The conserved topsoil and/or duff will be covered while it is stockpiled to prevent the capture of seeds of exotic plant species. Undesirable plant species will be controlled in high-priority areas and other undesirable species will be monitored and controlled, as necessary. To prevent the introduction of, and minimize the spread of, nonnative vegetation and noxious weeds, the following measures will be implemented during construction: • Minimize soil disturbance	NPS Resource Management Specialist, Vegetation and FHWA Project Inspector, NPS Project Supervisor

Resource Area	Mitigation	Responsible Party
	• Pressure wash and/or steam clean all construction equipment, except hauling vehicles, before entering the park to ensure that all equipment, machinery, rocks, gravel, and other materials are cleaned and weed free before entering ONP • Pressure wash hauling vehicles before entering the park for the first time; subsequent entries will not require pressure washing unless the vehicle shows signs of mud, plant material, or other substances that could be considered harmful • Cover all haul trucks bringing fill materials from outside the park to prevent seed transport • Limit vehicle and equipment parking to within construction limits • Limit disturbance to roadsides, culvert areas, and other areas inside the designated construction limits; no machinery or equipment should access areas outside the construction limits • Obtain all fill, rock, and additional topsoil from the project area, if possible; and if not possible, then obtain weed-free fill, rock, or additional topsoil from sources outside the park. NPS personnel will certify that the source is weed free. • Monitor disturbed areas for up to 3 years following construction to identify growth of noxious weeds or nonnative vegetation; treatment of nonnative vegetation will be completed in accordance with NPS-13, Integrated Pest Management Guidelines	
Water Quality and Soils	Erosion- and sediment-control BMPs, as described above in General Considerations, will be implemented to minimize erosion, avoid spills, and prevent sediment and other pollutants from entering West Twin Creek or the Hoh River. The tracked excavator will not drive in the stream and will drive slowly and carefully in the adjacent stream bed to minimize disturbance. Spill Prevention: A spill response plan will be developed prior to start of construction. The plan will include daily inspection of equipment to be operated near the stream and immediate repair of leaks. Measures in the Spill Plan also include: 1. Where feasible, each piece of equipment shall have its own spill kit on board. There shall be at least two kits on hand at the job site at any given time. Each spill kit contains a sausage boom and approximately 24 absorbent pads. Each person shall be trained in the use and response to a spill including required notification procedures. 2. Repairs, refueling, and adding potentially hazardous fluids to trucks and equipment shall be conducted away from the work site, where feasible. When repairs, refueling, or adding hazardous fluids to equipment on site, extra care will be taken by project personnel to prevent leaks and spills; and spill prevention kits, described in #1 above, shall be on hand. No bulk petroleum products shall be stored on site. Fuel will be brought in by truck in approved portable tanks, which are properly secured from tipping in pickup trucks. All of the tank nozzles shall be fitted with overflow prevention triggers. Fueling shall be done as far from the river or drainage course as possible. 3. Where appropriate, environmentally friendly grease, hydraulic oil, and bar and chain oil shall be used. These lubricants are vegetable or mineral oil based, less toxic, and biodegradable. 4. Equipment used on the project shall be maintained free of external petroleum-base products while working at the project locations. 5. In the event of any spill, contaminates shall be contained immediately and any contaminated soil shall be removed using the spill prevention kits described in #1 above. Any contaminated soil or vegetation shall be removed immediately by hand or with equipment and transported to	FHWA Project Inspector, NPS Project Supervisor

Resource Area	Mitigation	Responsible Party
	a certified disposal facility, specifically the Eclipse Corp. processing site in Port Angeles. 6. The driver/operator shall be present during refueling or transfer of any fuels or hazardous materials between equipment. Fueling shall be done at least 25 feet from the nearest culvert inlet or watercourse. Drip pans shall be present and used. Equipment shall not be topped off. Fueling shall be done during daylight hours. During periods of heavy rainfall and/or high creek flows, the project leader will halt work. During these work stoppage periods, project personnel will continue to check to ensure the silt fences or other erosion-control measures are performing adequately.	
Special Status Species	To minimize impacts to the marbled murrelet, project activities will not begin until early September, near the end of the murrelet late breeding season (August 6 to September 15). To protect marbled murrelets during sensitive feeding periods, construction activities will not start until 2 hours after sunrise and will stop 2 hours before sunset through September 15. The contractor will maintain strict garbage control to prevent scavengers (e.g., crows), which are predators on murrelet nests, from being attracted to the project area. No food scraps will be discarded or fed to wildlife. Mitigation for bull trout will be the same as described for Fishery Resources.	FHWA Project Inspector, NPS Project Supervisor
Fishery Resources	In-stream work will be scheduled from the beginning of September through October to minimize impacts to fish; however, this work window can be extended if low flow conditions continue to exist (with approval by park fisheries staff). The stream will be diverted during construction activities on each side of the bridge, but natural flow will be unimpeded after construction is completed. The project area will be stabilized and revegetated following construction. Pile driving will not occur in the stream and will be scheduled to occur after September 1, during low-flow periods when larval and juvenile Essential Fish Habitat (EFH) species are not likely to be present. In order to remove the derelict culverts, an excavator will need to operate in the floodplain. The excavator can cross West Twin Creek on the temporary bridge and enter the floodplain on the east side of the creek. This will eliminate the need for the excavator to cross the wetted channel. Several channel spanning logs may need to be moved in order to access the culverts. Disturbance of the channel when moving the logs will be minimal, with the duration of increased turbidity expected to last just minutes. Any fish in the disturbed area will have immediate access to other habitat either upstream or downstream of the work area. In no case will any wood be removed from the floodplain in order to provide access to the worksite. During culvert removal, operation of the tracked excavator will be avoided in the streambed, to the extent possible. Water-diversion measures will be installed, if needed, around the washed-out culverts before removal to move streamflow out of the work area and minimize suspension of sediments in the stream. The channel diversion will be limited to the area in the immediate vicinity of the culvert (~30 meters of stream). Ramping rates shall not exceed 1-inch/hour. Turbidity will be monitored during in-stream construction and culvert-removal activities. Work will be suspended if turbidity levels show significant increases over background levels until corrective measures could be implemented. Prior to beginning work in the floodplain at the bridge site, a smolt screen will be placed in the channel upstream of the construction area to prevent fish from migrating downstream into	NPS Fisheries Biologist, FHWA Project Inspector, NPS Project Supervisor

Resource Area	Mitigation	Responsible Party
	the work site. Placement of this screen will be done in cooperation with the Hoh Tribe and according to the standards contained in the Tribe's operation procedures for fish screens. No screen will be placed downstream of the work area, to ensure that fish can freely move away from the construction site to undisturbed habitat in the mainstem Hoh River or East Twin Creek. ONP will work with the Hoh Tribe to remove fish from the channel near the project area. During diversion, screens, flow-maintenance measures, and erosion-control measures will be used, and stranded fish will be hand netted and moved out of the project area.	
Cultural Resources	Park cultural resources staff will be available during construction to advise or take appropriate actions, if necessary. Should construction unearth previously undiscovered archaeological resources, work will be stopped in the area of any discovery and the park will consult with the state historic preservation officer/tribal historic preservation officer and the Advisory Council on Historic Preservation, as necessary, according to 36 CFR 800.13, Post Review Discoveries. In the unlikely event that human remains are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) will be followed. The NPS will ensure that all contractors and subcontractors are informed of the penalties for illegally collecting artifacts or intentionally damaging archaeological sites or historic properties. Contractors and subcontractors will also be instructed on procedures to follow in case previously unknown archaeological resources are uncovered during construction. Equipment and material staging areas will also avoid known archaeological resources.	NPS Archeologist FHWA Project Inspector, NPS Project Supervisor

NON-IMPAIRMENT OF PARK RESOURCES

Impairment is an impact that, in the professional judgment of the responsible manager, will cause permanent and/or major harm to the integrity of park resources or values, including opportunities that otherwise will be present for the enjoyment of those resources or values.

Overall, this project will result in beneficial effects to park resources and the visitor experience. The use of BMPs and mitigation during construction will reduce impacts to vegetation, fishery resources, special status species, soils, water quality, fishery resources, and cultural resources.

The NPS has determined that implementation of the proposed action will not constitute an impairment to ONP resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the EA, public comments received, relevant studies, and professional judgment of the decision-makers guided by direction in NPS Management Policies.

PUBLIC INVOLVEMENT

A list of issues and concerns related to reestablishing vehicular access on the Upper Hoh Road was identified through park internal scoping and through the public scoping process. Internal scoping involved an interdisciplinary team of park and regional staff,

and Federal Highways Administration personnel, who assessed the site conditions and determined potential issues and impact topics.

During the park internal scoping process, public scoping was conducted. The purpose of public scoping was to gain input on the issues or comments related to the proposed project and potential projects in the area that could lead to cumulative impacts. A press release was circulated February 22, 2007 requesting scoping comments related to replacement of the Upper Hoh Road—West Twin Creek crossing. The press release was sent to about 80 individuals, park neighbors, organizations, area tribes, local news media, and agencies on the park's mailing list. In addition, the press release was posted on the park website.

The EA was released for public review on May 30, 2007. An electronic version was posted to the National Park Service PEPC site (http://parkplanning.nps.gov) and made available as hard copy or CD. A hard copy was sent to about 55 individuals, organizations, governments, and interest groups on the park's mailing list. An additional 130 people were notified of its availability by email, including about 100 media outlets. A press release provided notification of the availability of the EA and it was published in at least three area newspapers, *Peninsula Daily News* on June 1, 2007; the *Daily World* (Grays Harbor and Pacific counties) on June 2, 2007; and the *Port Townsend* and *Jefferson County Leader* on June 8, 2007.

The public comment period was open until June 13, 2007. Interested parties could comment using the National Park Service PEPC site, by email to olym_@nps.gov, by fax, regular mail, or hand delivery. Four comment letters were received; one from an individual, two from interest groups, and one from a local governmental entity. Each comment was considered and reviewed by park staff.

Several comments expressed support for the Preferred Alternative to restore natural hydrologic conditions, provide fish passage, and to reestablish visitor access. One comment expressed concern about protecting the natural soundscape during construction. As stated in the EA, the park will use the best available methods during construction to minimize construction-related noise and to complete the project as quickly as possible to minimize the duration of elevated noise.

Another comment questioned what management actions will be taken to stabilize and prevent erosion, and protect sensitive vegetation and wildlife, soils, hydrology, and water quality related to the temporary bridge until the permanent bridge is completed. The temporary bridge was installed to provide secure and safe access into the park. The bridge abutments and slopes are stabilized with riprap and no significant adverse impacts to natural resources are anticipated while the permanent bridge is being constructed. Regular maintenance and inspections will be used to ensure that the temporary bridge does not result in resource damage.

One comment noted the statement in the EA that work will be conducted during the low-flow period from September to mid-January. The park intended to state that the in-

channel work in West Twin Creek for removal of the washed-out culverts, and bridge construction will be conducted during September to October when flows are low, or work can be extended if low flow conditions continue to exist, to minimize impacts to fish. The entire project construction period will extend into January but no instream work will occur after flows increase and fish are present. This was clarified through edits, as documented in an Errata prepared as a technical attachment to the EA.

Another commenter was concerned that only a No Action and Preferred Action alternative were evaluated and that a wider range of alternatives should be considered, such as long-term sustainable access for the Hoh River Valley. The park considered several alternatives for this project and conducted a detailed evaluation of the most feasible. Repairing the road using culverts and closing the road were alternatives considered, but rejected because they did not meet the project purpose. Long-term sustainability issues are beyond the expressed purpose and need for the proposed project and are addressed in the General Management Plan, which is currently being prepared.

The commenters did not provide any additional, new, or substantive information. The slight modification of the EA related to the timing of construction was corrected and will not change the determination of impact significance.

CONSULTATION AND COORDINATION

Informal consultation with the U.S. Fish and Wildlife Service (FWS), the U.S. Army Corps of Engineers (COE), Washington State Department of Environment (DOE), and the Hoh Tribe was initiated early in the process, beginning with emergency repairs following the November 2006 storm. Coordination with these agencies and the Hoh Tribe proceeded through the installation of the temporary bridge and reopening of the road for administrative access. Agency and tribal coordination continued with planning for a permanent repair during an on-site meeting on April 12, 2007 with the FWS, COE, and Hoh Tribe to consider alternatives and discuss potential issues.

The park submitted a Joint Aquatics Resources Permit Application (JARPA) to the COE, Washington DOE, and the Washington Department of Fish and Wildlife on June 1, 2007. The application included a request for a 404 Nationwide Permit 14 under the Clean Water Act for linear transportation projects to cover stream channel work during bridge construction. No bridge work will begin until the permit is issued.

On May 22, 2007, the park requested consultation with the National Oceanic and Atmospheric Administration (NOAA) under the Magnuson-Stevens Fishery Conservation Management Act regarding adverse effects to designated essential fish habitat for Chinook salmon and coho salmon. In a letter dated June 11, 2007, NOAA recommended conservation measures in addition to those in the EA, and indicated that incorporation of
these mitigation measures into the project are adequate to minimize the effects of sediment delivery to the stream. Most of the conservation measures suggested by NOAA

have been added to the mitigation measures included in Table 1. However, the recommendation for a longer bridge span was not considered as the proposed bridge span has been designed with a 43-foot wide bank-full-width to allow for peak flows and the replication of stream characteristics (e.g. passage of fish, sediment, and woody debris).

Informal consultation occurred with the FWS through a biological assessment sent on May 22, 2007. A letter of concurrence was received from the FWS on June 26, 2007, agreeing with the determination of "may affect, not likely to adversely affect" for northern spotted owls, marbled murrelets, and bull trout. Mitigation measures to minimize effects to threatened and endangered species, as listed in Table 1, have been incorporated into the project.

Tribal consultation with the Hoh Tribal Business Council was formally initiated in an April 5, 2007 letter to the Tribal Chair. Representatives of the Hoh Tribe also participated in the April 12, 2007 on-site meeting and were involved in the development of mitigation measures for the project. The Hoh Tribe responded with a letter on June 25. Although they support the project, they had several suggested changes to the EA which were incorporated-by-reference into the document as shown on errata sheets (prepared as a technical attachment to the EA), and they asked for clarification on trust resources, which is an issue outside the scope of the EA.

Consultation with the State Archeologist/Department of Archaeology and Historic Preservation (SHPO) was formally initiated on April 5, 2007. The SHPO concurred on April 9, 2007 with the area of potential effect and the finding of no effect to resources eligible for listing in the National Register of Historic Places.

CONCLUSION

Based on the conservation planning and environmental impact analysis documented in the EA, with due consideration of the nature of the public comments and consultations with other agencies, and given the capability of the mitigation measures to avoid, reduce, or eliminate impacts, the NPS has determined that selected actions do not constitute a federal action that normally requires preparation of an environmental impact statement (EIS). The selected actions will not have a significant effect on the quality of the human environment or the park's cultural resources, or natural resources, and are not likely to adversely affect threatened or endangered species.

There are no unmitigated adverse impacts on public safety, sites, or districts listed in, or eligible for listing in, the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, cumulative effects or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law. Based on the foregoing, it has been determined that an EIS will not be prepared and the selected actions may be implemented as soon as practicable.

Recommended:

for William G. Laitner
Superintendent, Olympic National Park

7/2/07
Date

Approved:

for Jonathan B. Jarvis
Regional Director, Pacific West Region

7/3/07
Date