

## **Cape Alava and Sand Point Wilderness Trails Rehabilitation**



### You're Invited!

The National Park Service (NPS) is requesting your input in developing the alternatives for reconstruction of the Ozette trails in Olympic National Park (the park). Your participation is vital to our planning process. Your electronic or written comments are needed. See below for how to comment.



Boardwalk with broken and missing planks on parallel stringers along the Sand Point Trail

#### **Background**

The Cape Alava and Sand Point trails access each end of a 3-mile section of beach creating a 9-mile triangular wilderness hike, starting from the Lake Ozette Trailhead. Both trails are open year-round and are very popular for beach access, as is the 9-mile backpacking loop, which can also be done as a day hike. Ozette is the busiest trailhead for overnight wilderness use in the park. Approximately 19 percent of overnight wilderness hikers use this area.

Due to the very wet conditions in the area, in the early years of the trail's existence, boards were laid on the ground to ease travel through the landscape. Later, a raised boardwalk was constructed to cross the wet areas so that wide muddy sections no longer developed. Where creeks crossed the trail, bridges were constructed. This increased protection for wetlands and wetland vegetation alongside the trail. Except within the park and a few other areas, coastal vegetation communities have been impacted by logging or converted to developed areas, increasing their rarity in the region.

The original board-lined trail and boardwalk were constructed using material harvested along the trail route. Materials for the hand-split cedar and log stringers were gathered from sites close to the trail. Because of the area's wilderness designation and the desire to avoid harvesting materials in a national park, repairs and reconstruction now necessitate that trail construction materials be imported.

A boardwalk is a wood deck elevated above the ground surface, usually set on stringers (i.e., horizontal support beams) that parallel the direction of travel. Boardwalks help users navigate over wet or marshy terrain while allowing for natural, dispersed water flow. Boardwalks have minimal contact with the ground. In the coastal prairies and forested wetlands, boardwalks allow for natural surface flow in areas where other trail structures may alter ecosystem processes. Maintaining surface hydrological connections is an important function of the boardwalk.



Turnpike needing repair (new gravel)

### Purpose of and Need for Taking Action

#### Purpose

The park's purpose in taking action is to replace deteriorated wilderness boardwalk sections on the Cape Alava and Sand Point trails in Olympic National Park. Under the proposed project, the park would evaluate whether to replace the boardwalk in-kind or to convert non-wetland sections of the boardwalk to turnpike (a series of ground-level wood boxes filled with gravel and soil).

#### Need

Approximately 9,500 linear feet (70 percent) of the total 13,533 feet of boardwalk on the Cape Alava and Sand Point trails is in poor condition. The two trails are located almost entirely in wilderness and are comprised of boardwalk (approx. 7,289 feet for Cape Alava and 6,244 feet for Sand Point), on-ground trail with no added raised structures (approx. 1,857 feet for Cape Alava and 1,567 feet for Sand Point), and turnpike (approx. 8,627 feet for Cape Alava and 6,974 feet for Sand Point). Boardwalks have an average life expectancy of 15-20 years. Turnpike lasts approximately 35-40 years. Boardwalks require maintenance approximately every two years to level the surface, replace broken boards, and inspect stringers. Turnpike needs minimal or no maintenance over 20 years. Around 35-40 years it requires resurfacing, with up to about half the turnpike depth needing additional gravel. Most of the boardwalk on these trails has reached the end of its life expectancy.

## **Key Considerations**

- Protect Olympic National Park's wilderness character.
- Protect the natural resources and environments that are unique to the park.
- Reduce the potential for staff and visitor safety issues associated with boardwalk in poor condition.
- Maintain the trail in its current alignment to respect the usual and accustomed lands of the Makah and Quileute tribes.
- Identify a long-term maintenance strategy for trail repair that is achievable with available resources.
- Conduct a minimum requirements analysis that identifies the minimum tools and activities necessary to successfully meet the purpose and need.



Boardwalks allow for natural surface flow in coastal prairies and forested wetlands

## **Preliminary Alternative Concepts**

NEPA requires federal agencies to:

- consider a range of alternatives; and to
- fully evaluate all reasonable alternatives that address the purpose of and need for the action, including a No Action alternative.

The following are the preliminary alternative concepts that have been developed so far by NPS staff. Please provide us with your thoughts about this initial list and offer any ideas you might have for other alternative concepts.

**No action alternative** – Continue current management of replacing small sections of boardwalk by hand-carrying new materials to the site based on the availability of work crews. The structural components of the boardwalk would continue to deteriorate faster than they can be replaced given current trail crew capacity, including the inability to bring in materials in the needed quantities. Frequent trail closures would be likely due to the inability to repair damaged sections in a timely manner due to the extent of work required.



Repaired boardwalk on Sand Point Trail with materials carried in by hand

**Replace trail materials in-kind using helicopter transport** – Replace boardwalk in-kind by transporting decking, stringers, and other construction materials via 3-5 days of helicopter flights (approx. 178-250 round trips) over a five-year timeframe. Flights would occur after Labor Day through March 31. Deteriorated sections of turnpike would also be resurfaced in-kind within the same alignment. This alternative would result in trail surfacing most similar to the existing trail.

**Increase turnpike, where it does not adversely affect water flow, using helicopter transport** – Replace boardwalk with turnpike where surface conditions (terrain, vegetation, and trail alignment) make it practical and inkind elsewhere to ensure the continued natural flow of surface water while increasing long-term trail sustainability and wilderness resource protection. Transport of materials would be via 13-15 days of helicopter flights (approx. 690-835 round trips) over a five-year timeframe. Flights would occur after Labor Day through March 31. This alternative would provide the most robust trail over the longest period of time without need for major repairs in the interim.

## Preliminary Alternative Concepts Considered but Dismissed

The following alternatives were considered during the design phase of the project. These alternatives were dismissed from further consideration because they do not meet the purpose and need, duplicate other alternatives, have more impacts, or do not protect resources better than one of the other alternatives.

#### Use pack stock to transport boardwalk materials and equipment

The Cape Alava and Sand Point trails are hiker only trails and were not built to accommodate stock due to the need for raised trail surfaces to better protect wetland and cultural resources. The trails cannot hold the weight of stock, especially an animal loaded with materials and equipment. In addition, the numerous trail bridges were also not built to withstand the weight of stock. Sections of the trail that are currently in good condition could also be damaged from the extra trips/weight.

## Systematically replace Ozette triangle wilderness trails in-kind with on-ground trail, turnpike, or boardwalk, transporting materials by hand

Over 5 years, trail crews would be able to hand-replace about only 30 percent of the 9,500 linear feet of Sand Point and Cape Alava trails above-grade boardwalk deck and stringers in poor condition. Replacing this portion would require approximately 4,339 person trips (walking an estimated 21,695 miles) to carry the deck boards. Another 40 trips would be required for the hardware/tools. Full-length 3"x 6" x 3' deck boards weigh 20-30 lbs. Each of these boards would need to be moved to trail locations up to 2.5 miles from the trailhead. Trips would also be required to carry the

stringers. Full-length 4"x 6" x 12' stringers weigh 80-120 lbs. The stringers would require about 1,767 trips (average 80-120 lbs. a trip) to carry the lumber to the project sites, or approximately 3,887 miles walked. As with the deck boards, the stringers would need to be moved to trail locations up to 2.5 miles from the trailhead.

Based on recent work, the trail crew can replace approximately 600 feet of deck boards over a five-month period per year when carrying materials by hand. This work has not included replacing the 12' long stringers.

In addition to the length of time and number of trips it would take to hand-carry materials, there are also concerns about crew safety from repetitive stress injuries associated with carrying loads up to 120 lbs. to locations up to 2.5 miles from the trailhead. Because the boardwalks are already in poor condition, environmental conditions such as snow, rain, and ice could exacerbate hazardous walking conditions. While 30 percent would be replaced, the other 40 percent of the boardwalk in poor condition would continue to deteriorate.

#### Evaluate the feasibility of improving the Cape Alava and Sand Point trails to make them more accessible

The Cape Alava and Sand Point trails do not currently meet Architectural Barriers Act (ABA) Outdoor Developed Area Standards because they include numerous steps, and the trail (boardwalk and turnpike) are less than three feet wide with no passing or resting areas that meet ABA standards. In addition, most bridges are not 3-feet wide and trail grades and cross slopes exceed ABA standards in numerous locations.

According to the ABA, "When the original design, function, or purpose of an existing trail is changed...the altered portion of the existing trail must comply with the technical requirements for trails" if the altered portion connects to another accessible section. As noted above, this is not the case with the Cape Alava or Sand Point trails. Undertaking a project to improve the Cape Alava and Sand Point trails to meet ABA would require redesign and widening of the entire six miles of trail, which would have more natural and cultural resources impacts, and would change the scope of the proposed project. Future accessibility improvements at Ozette are being considered as part of a park-wide Accessibility Strategic Evaluation and Transition Plan scheduled to begin in 2022.

#### Replace all boardwalk with turnpike

This would adversely affect wetlands and require many more helicopter flights, with much more extensive impacts on wilderness character.

#### Use native materials from near the trail instead of importing materials

In the previous six decades of boardwalk replacement, the area surrounding the trail has intermittently to regularly been used to obtain native construction materials, making it unlikely that enough additional suitable materials could be obtained. Most of the suitable construction materials have been used and NPS policy has shifted away from using nearby materials to using purchased materials. In addition, this alternative would have additional natural and trammeling impacts on wilderness character.

#### Limit trail use seasonally

Ozette is wet year-round; regardless of limited use scenarios, the trail surfaces (boardwalk, on-ground, or turnpike) would have to be kept in good condition. It is generally weather, climate, tree fall, or other natural hazards, rather than visitor use, that affect the longevity of the boardwalk.

#### Do not replace the above-ground trail surfaces (boardwalk or turnpike)

Not maintaining or replacing above-ground trail surfaces would have more adverse effects on wetlands and other natural resources, cultural resources (archeological sites), employee and visitor safety, and wilderness. Trail sections are becoming deteriorated with age. As they potentially collapse or are removed and a soggy trail remains, this alternative would adversely affect all of the above resources.

#### Modify beach sections connecting the two trails

The proposed project is limited to the overland sections of trails, particularly the sections currently in poor condition.

#### **Reroute the trail entrance**

Although the entrance occasionally floods, rerouting staff and visitors through this area does not require trail construction. Rather, this can be done with signage and is a planned project separate from this EA.

# Use much larger drain rock as the first layer over soil in the turnpike sections (to better prevent impedance of any surface water flow)

Although this alternative would assist in some improvement in surface water flow, it would require many more helicopter flights, causing additional wilderness impacts during construction, including a much longer construction period.

## Tentative NEPA Timeline and Current Stage in the Process

Spring 2022	Civic Engagement WE ARE HERE
Summer 2022	Environmental Assessment Release and Public Comment
Fall 2022	Release Decision Document (Finding of No Significant Impact (if warranted))
Spring 2023	Begin Project Implementation

## How to Comment

- Submit comments electronically at: <u>https://parkplanning.nps.gov/OzetteTrails</u> (preferred method).
- 2. Submit written comments at the park's offices in Port Angeles or by mail to:

Olympic National Park Lee Taylor, Acting Superintendent Ozette Trails EA 600 East Park Avenue Port Angeles, WA 98362-6798

Comments will be accepted starting Monday, March 28 through 11:59 p.m. MDT on Tuesday, April 26, 2022.

Please note that your entire comment—including personal identifying information such as your address, phone number, and e-mail address—may be made publicly available at any time pursuant to the Freedom of Information Act. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. Comments submitted by individuals or organizations on behalf of other individuals or organizations will not be accepted.

## Mailing List

If you wish to receive future updates on this project, please send an email to laura\_gray@nps.gov and include your email address. (Note: Public comments will not be accepted at this email address.) The mailing list will be used solely to communicate information related to the Cape Alava and Sand Point Trails Rehabilitation. If you do not have an email address, please contact the park at (360) 565-3004 to have your name placed on the mailing list.