

Comment Letter 1

Katie Carroz

From: Loftsgaarden, Kirk (FHWA) <Kirk.Loftsgaarden@dot.gov>
Sent: Tuesday, August 09, 2016 3:28 PM
To: Morrow, Stephen (FHWA); Gray Rand
Cc: Katie Carroz
Subject: FW: Upper Hoh River Bank Stabilization EA

FYI – I sent Mr. Lewis the link again and followed up with a call to make sure he received my email. So far, no feedback on whether the link I sent him worked.

Kirk

From: Dave Lewis [<mailto:dclewis3939@msn.com>]
Sent: Monday, August 08, 2016 2:32 PM
To: Loftsgaarden, Kirk (FHWA)
Subject: Upper Hoh River Bank Stabilization EA

Kirk,

The link shown on your Notice of Availability, August 8, 2016 will not work for us. Would you send us an email with the EA attached. A map showing the location of the improvements and section details would be most helpful.

Thank you,

Dave and Carol Lewis dclewis3939@msn.com Summer Phone: 253-863-9740 Carol's Cell Phone 253-208-6520

Comment Letter 2

Katie Carroz

From: Loftsgaarden, Kirk (FHWA) <Kirk.Loftsgaarden@dot.gov>
Sent: Monday, August 15, 2016 12:57 PM
To: Gray Rand; Katie Carroz; Morrow, Stephen (FHWA)
Subject: FW: Upper Hoh River Road Bridge

FYI - here is another comment.

-----Original Message-----

From: Ben Kashdan [<mailto:bt Kashdan@gmail.com>]
Sent: Monday, August 15, 2016 11:54 AM
To: Loftsgaarden, Kirk (FHWA)
Subject: Upper Hoh River Road Bridge

Hi there,

I was wondering what the upcoming work schedule will be for the bridge work on the Upper Hoh River Road. I work for the park and just want to make sure I can avoid the most congested periods when I go to work at the Hoh. Please let me know when active construction is being planned for that bridge that will block passage. Thanks!

Ben Kashdan
423.534.0791
bt Kashdan@gmail.com

Comment Letter 3

Katie Carroz

From: Morrow, Stephen (FHWA) <stephen.morrow@dot.gov>
Sent: Tuesday, August 09, 2016 3:44 PM
To: Katie Carroz
Cc: Gray Rand; Loftsgaarden, Kirk (FHWA)
Subject: FW: Upper Hoh River Road Bank Stabilization - Environmental Assessment Notice of Availability

Katie:

Would you be able to mail a hard copy of the EA to Elaine Somers? Thanks!

STEVE MORROW

Environmental Protection Specialist
FHWA (Western Federal Lands)
610 E 5th Street
Vancouver, WA 98661
(360) 619-7811
stephen.morrow@dot.gov

From: Somers, Elaine [<mailto:somers.elaine@epa.gov>]
Sent: Monday, August 08, 2016 4:56 PM
To: Morrow, Stephen (FHWA)
Subject: RE: Upper Hoh River Road Bank Stabilization - Environmental Assessment Notice of Availability

Hello, Stephen,
If you have one available, would you mind sending me a hard copy of this EA? I would be so grateful.
Thank you!

Elaine Somers
US Environmental Protection Agency
1200-6th Ave., Suite 900, 20th Floor
Office of Environmental Review and Assessment
Environmental Review and Sediment Management Unit
Seattle, WA 98101

Somers.elaine@epa.gov
206-553-2966

From: Morrow, Stephen (FHWA) [<mailto:stephen.morrow@dot.gov>]
Sent: Thursday, August 04, 2016 1:28 PM
To: Somers, Elaine <somers.elaine@epa.gov>
Subject: FW: Upper Hoh River Road Bank Stabilization - Environmental Assessment Notice of Availability

From: Morrow, Stephen (FHWA)

Sent: Thursday, August 04, 2016 1:22 PM

To: allison@setrust.net; theresa.powell@dfw.wa.gov; Rebecca McAndrew (rebecca.e.mcandrew@usace.army.mil); 'lisa_turecek@nps.gov'; MReinders@co.jefferson.wa.us; 'mhagen@Hohrivertrust.org'; 'bridget.kaminski-richardson@dnr.wa.gov'; Acker, Marty (marty_acker@fws.gov); Kingsbury, Lori (ECY) (loch461@ECY.WA.GOV)

Cc: Loftsgaarden, Kirk (FHWA); Gray Rand (Ogr@deainc.com); Katie Carroz (Katie.Carroz@deainc.com)

Subject: Upper Hoh River Road Bank Stabilization - Environmental Assessment Notice of Availability

Greetings:

The Western Federal Lands Highway Division of the Federal Highway Administration (WFLHD), in partnership with Jefferson County, plan to construct bank stabilization and bridge and culvert improvements in six locations along the Upper Hoh River Road (UHRR). The proposed improvements' purpose is to prevent the road from washing away at these locations and provide safe and consistent access to residents, businesses and Olympic National Park (ONP) visitors via UHRR. WFLHD has recently completed the 30% design detail plan set for the project and will be soliciting public comments on the draft Upper Hoh River Road Project Environmental Assessment (EA) starting next week, August 8 through September 7, 2016. This email is to provide you an 'advance copy' of the EA. The EA can be found at the link below:

<https://flh.fhwa.dot.gov/projects/wa/upper-hoh/>

Thank again for your time and input on this project, we look forward to continuing to work with you all to move this project to a successful conclusion.

STEVE MORROW

Environmental Protection Specialist

FHWA (Western Federal Lands)

610 E 5th Street

Vancouver, WA 98661

(360) 619-7811

stephen.morrow@dot.gov

Comment Letter 4

Katie Carroz

From: Loftsgaarden, Kirk (FHWA) <Kirk.Loftsgaarden@dot.gov>
Sent: Tuesday, August 16, 2016 3:27 PM
To: Gray Rand; Katie Carroz
Cc: Morrow, Stephen (FHWA)
Subject: FW: comments on the Upper Hoh River Road Bank Stabilization Project Environmental Assessment.

FYI – See comment below from DNR.

From: Kaminski-Richardson, Bridget (DNR) [<mailto:Bridget.Kaminski-Richardson@dnr.wa.gov>]
Sent: Tuesday, August 16, 2016 3:11 PM
To: Loftsgaarden, Kirk (FHWA)
Subject: comments on the Upper Hoh River Road Bank Stabilization Project Environmental Assessment.

Hi Kirk,
Thank you for taking comments on the Upper Hoh River Road Bank Stabilization Project Environmental Assessment. My only comment is to please send me a JARP for any work that will be performed on state-owned aquatic land to start the authorization process.

Thanks,
Bridget

Bridget Kaminski-Richardson
Aquatic Land Manager
Aquatic Resources Division, Orca-Straits District
Washington State Department of Natural Resources (DNR)
Phone 360-732-0934
bridget.kaminski-richardson@dnr.wa.gov
www.dnr.wa.gov

Comment Letter 5

Katie Carroz

From: Morrow, Stephen (FHWA) <stephen.morrow@dot.gov>
Sent: Friday, August 19, 2016 10:19 AM
To: Katie Carroz
Cc: Loftsgaarden, Kirk (FHWA); Gray Rand
Subject: FW: Upper Hoh River Road Bank Stabilization - Environmental Assessment Notice of Availability

Katie:

Would you mind burning a CD of the EA and mailing to Theresa Powell?

From: Powell, Theresa E (DFW) [<mailto:Theresa.Powell@dfw.wa.gov>]
Sent: Friday, August 19, 2016 10:17 AM
To: Morrow, Stephen (FHWA)
Subject: RE: Upper Hoh River Road Bank Stabilization - Environmental Assessment Notice of Availability

Hello Stephen

I have attempted many times to download the zipped Draft Environmental Assessment for the Upper Hoh project and have not been successful (utilizing <https://flh.fhwa.dot.gov/projects/wa/upper-hoh/>). Is there another link? Or could I have disc copy sent to the address below?

Theresa Powell
Habitat Biologist
WDFW/Habitat Program
332 E 5th St #230
Port Angeles WA 98362
office: 360-417-1434
cell: 360-461-4263
theresa.powell@dfw.wa.gov

From: Morrow, Stephen (FHWA) [<mailto:stephen.morrow@dot.gov>]
Sent: Thursday, August 04, 2016 1:22 PM
To: allison@setrust.net; Powell, Theresa E (DFW); Rebecca McAndrew (rebecca.e.mcandrew@usace.army.mil); lisa_turecek@nps.gov; MReinders@co.jefferson.wa.us; mhagen@Hohrivertrust.org; bridget.kaminski-richardson@dnr.wa.gov; Acker, Marty (marty_acker@fws.gov); Kingsbury, Lori (ECY)
Cc: Loftsgaarden, Kirk (FHWA); Gray Rand (Ogr@deainc.com); Katie Carroz (Katie.Carroz@deainc.com)
Subject: Upper Hoh River Road Bank Stabilization - Environmental Assessment Notice of Availability

Greetings:

The Western Federal Lands Highway Division of the Federal Highway Administration (WFLHD), in partnership with Jefferson County, plan to construct bank stabilization and bridge and culvert improvements in six locations along the Upper Hoh River Road (UHRR). The proposed improvements' purpose is to prevent the road from washing away at these locations and provide safe and consistent access to residents, businesses and Olympic National Park (ONP) visitors via UHRR. WFLHD has recently completed the 30% design detail plan set for the project and will be soliciting public comments on the draft Upper Hoh River Road Project Environmental Assessment (EA) starting next week, August 8

through September 7, 2016. This email is to provide you an 'advance copy' of the EA. The EA can be found at the link below:

<https://flh.fhwa.dot.gov/projects/wa/upper-hoh/>

Thank again for your time and input on this project, we look forward to continuing to work with you all to move this project to a successful conclusion.

STEVE MORROW

Environmental Protection Specialist

FHWA (Western Federal Lands)

610 E 5th Street

Vancouver, WA 98661

(360) 619-7811

stephen.morrow@dot.gov

Comment Letter 6

Katie Carroz

From: Nicolas Pfeffer-Taggart <nicolas.pfeffer-taggart@hohtribe-nsn.org>
Sent: Friday, August 26, 2016 9:17 AM
To: Katie Carroz
Cc: kirk.loftsgaarden@dot.gov; Steve Allison
Subject: Upper Hoh River Road Project Draft EA

Greetings Ms. Carroz,

I am writing to request a copy of the proposed project locations as presented in the July 2016 Preliminary Draft EA to be made available in a GIS format (shapefile, personal/file geodatabase, or kml). These data will greatly assist our staff in reviewing the proposed project activities and help us formulate comments, suggestions and concerns in a timely manor. If you have any questions or need clarification, feel free to email or call me at 360-780-0412.

Thanks for your help,

Nic

--

Nicolas Pfeffer-Taggart
GIS Specialist - Hoh Tribe Natural Resources
Cell [360-780-0412](tel:360-780-0412)

Comment Letter 7

Katie Carroz

From: Morrow, Stephen (FHWA) <stephen.morrow@dot.gov>
Sent: Friday, August 26, 2016 1:07 PM
To: Loftsgaarden, Kirk (FHWA); Gray Rand
Cc: Katie Carroz
Subject: FW: Hoh Road ELJ's and Hoh River Trust

See comment below...

Gray, I know you get back August 31, after some initial morning catch-up would you be available for a conference call at 11:00 to discuss some of the comments/concerns raised by the Hoh River Trust?

From: Acker, Marty [mailto:marty_acker@fws.gov]
Sent: Friday, August 26, 2016 12:58 PM
To: Morrow, Stephen (FHWA)
Subject: Hoh Road ELJ's and Hoh River Trust

Steve,

The Hoh River Trust (HRT) called me this morning because I am the USFWS contact in Washington State for the Cooperative Endangered Species Conservation Fund (aka Section 6 grants). Our grants (exceeding 12m between 2003 and 2006) were instrumental to the conservation acquisitions by HRT near the Upper Hoh River Road Bank Stabilization project area. Our grant program requires that the lands be managed for the benefit of the listed species and HRT has worked diligently to ensure that outcome. The HRT expressed a few concerns to me about details of the UHRR stabilization project, and they also shared some positive remarks about the recent improvements to the project design, preferring the ELJs over the previously described barbs.

HRT's concerns that I heard today:

One of the concerns expressed was that some of the work is proposed on lands owned by HRT and they seek coordination with WFLHD about operations on their lands, particularly as it pertains to the meeting the purpose of the grants they received (protection of habitats for listed species).

Another concern HRT expressed was that, by their judgment, the ELJs will deflect the river into their land on the Schmidt Bar with significant likelihood of eroding away HRT lands, including likely occupied murrelet habitat.

Finally, HRT mentioned that the community around the project area typically relies on dial-up internet connections, so the NEPA documentation is too large for many people to download, leading to excess demand for the library copies. Separate from my Section 7 consultation, I wanted to pass along to you that it appears the community is having trouble accessing enough copies of the NEPA documents. Hopefully additional copies can be made available. I do not know who or where that is sought.

My questions:

For my work with the grant-acquired lands, could you help me understand exactly what portions of the project are on HRT lands, particularly on those lands acquired through our grant program? How is WFLHD approaching these issues? Is WFLHD coordinating with HRT?

For my work on the Section 7 Consultation, can you help me to assess the whether there is a likelihood of damage to murrelet habitat as a result of ELJ installation? Does that concern match WFLHD's hydrogeomorphic assessments? If so, my analysis will need to consider this as a significant effect of the project, which is not something I was anticipating.

Your insights are appreciated.

Best,
Marty

*Marty Acker Marty_Acker@fws.gov
USFWS Endangered Species Ecologist
510 Desmond Dr. SE, Lacey, WA 98503
O: 360-753-9073 C: 360-951-6970*

Comment Letter 8

Katie Carroz

From: Loftsgaarden, Kirk (FHWA) <Kirk.Loftsgaarden@dot.gov>
Sent: Wednesday, August 31, 2016 9:27 AM
To: Katie Carroz; Morrow, Stephen (FHWA)
Cc: Leon, Sven A (FHWA)
Subject: FW: Upper Hoh River Bank Stabilization EA

FYI – here is another comment. This is similar to Hoh Trust comments.

Kirk

From: Dave Lewis [<mailto:dclewis3939@msn.com>]
Sent: Wednesday, August 31, 2016 9:13 AM
To: Loftsgaarden, Kirk (FHWA)
Subject: Re: Upper Hoh River Bank Stabilization EA

Kirk,

Please consider the following to be our comments for the above noted project:

It appears that the proposed work along the right (North) bank of the Hoh River is not being performed up stream or adjacent to our property located along the left bank of the Hoh River. Please keep in mind that any work which would extend into the river channel will effect the river channel upstream and downstream of such encroachment. Encroachments, constructed in the past, have already caused damage to property along the left bank of the Hoh River. Please keep us informed of the projects process. Thank you for the opportunity to comment.

Dave and Carol Lewis dclewis3939@msn.com Summer Phone: 253-863-9740 Carol's Cell Phone 253-208-6520

From: Dave Lewis <dclewis3939@msn.com>
Sent: Wednesday, August 10, 2016 11:59 AM
To: Loftsgaarden, Kirk (FHWA)
Subject: Re: Upper Hoh River Bank Stabilization EA

Thanks Kirk. The link worked. Do not know why I could not get the address to work when I typed it in. We will be sending comments.

Dave and Carol Lewis dclewis3939@msn.com Summer Phone: 253-863-9740 Carol's Cell Phone 253-208-6520

From: Loftsgaarden, Kirk (FHWA) <Kirk.Loftsgaarden@dot.gov>
Sent: Monday, August 8, 2016 2:41 PM
To: Dave Lewis
Subject: RE: Upper Hoh River Bank Stabilization EA

Dave –

Give this one a try.

<https://flh.fhwa.dot.gov/projects/wa/upper-hoh/>

[FLH](#) > [Projects](#) > [Washington](#) > [Upper Hoh River Road Phase 2](#)

flh.fhwa.dot.gov

Public Involvement. The information is based on best available data and will be updated as better data becomes available. Upper Hoh River Road Project Information ...

Kirk Loftsgaarden
FHWA
360-619-7512

From: Dave Lewis [<mailto:dclewis3939@msn.com>]
Sent: Monday, August 08, 2016 2:32 PM
To: Loftsgaarden, Kirk (FHWA)
Subject: Upper Hoh River Bank Stabilization EA

Kirk,
The link shown on your Notice of Availability, August 8, 2016 will not work for us. Would you send us an email with the EA attached. A map showing the location of the improvements and section details would be most helpful.
Thank you,

Dave and Carol Lewis dclewis3939@msn.com Summer Phone: 253-863-9740 Carol's Cell Phone 253-208-6520

Comment Letter 9

Katie Carroz

From: Loftsgaarden, Kirk (FHWA) <Kirk.Loftsgaarden@dot.gov>
Sent: Thursday, September 08, 2016 11:15 AM
To: Katie Carroz; Gray Rand
Cc: Morrow, Stephen (FHWA)
Subject: FW: Upper Hoh River River Road Project

Importance: High

FYI – another comment.

From: john richmond [<mailto:watermaps@hotmail.com>]
Sent: Wednesday, September 07, 2016 4:10 PM
To: Loftsgaarden, Kirk (FHWA)
Subject: Upper Hoh River River Road Project
Importance: High

ATTN:
Kirk Loftsgaarden
Western Federal Lands Highway
Federal Highway Administration
610 E. Fifth Street
Vancouver, Washington 98661

I have reviewed a hard copy of said project Environmental Assessment and offer the following comments:

From childhood, was raised on the Hoh River, and have memories back to 1940, where at the age of 4, remember my father loading logs on trucks to haul on the Upper Hoh Road about 10 miles to US Highway 101. I continue to be a landowner of nearly 100 acres along the river. As such, I have used the Upper Hoh Road as access to school along the proposed project areas, via the Huelsdonk Bridge until it was decommissioned in 1966.

I feel that I have a reliable basis of historical data and knowledge of past efforts to manage the road infrastructure along the project sites.

The river channel location was frequently influenced by a large log jam accumulated on a gravel bar and even by a small, 1-ft. diameter tree toppled to cause the formation of a new long-term channel.

Efforts to stabilize a bank of the river consisted of cutting key logs of a jam at the downstream and waterside to allow flotation by the next seasonal flood. Landowners without significant financial resources would resort to tying logs to trees along the bank, or by caballing the tree prior to felling it into the stream. Infrequently, a bulldozer was available to manipulate a gravel bar or deepen a channel to divert flow in a desired direction.

When quarried rock was available, it was tried with varying success to stabilize the banks near roads. Drifting logs and trees or undermining would impact the stability of even the carefully placed rip-rap. The greater problem is the undercutting of the toe of the riprap. The rock is often simply dumped until it quits rolling and yet not back-filling from below the depth of the Thalweg. The deposits on the channel bottom need to be

excavated to a width of not less than 20 ft. and depth of about twice the size of the large dimension of the rip-rap to be placed.

The stability of rip-rap containing logs with the roots attached is affected whether the logs are cabled to piling or dead-man anchors on shore, leverage from flotation effect, vibration from water flow, and snagging of, and impact from floating drift logs. The length along the shoreline and shape of upstream and downstream termini needs to ensure avoiding back-eddies. Use of Dolosse may aid in stabilizing the infrastructure, if carefully placed.

Due to severe erosion of the Tower Creek (H-14) channel bottom, it would appear that Class 4 rip-rap treatment should be extended below and across the channel.

Do the calculations include the 2016 mandate for increased flow?

Would the fish be impacted? Yes, as a result of planned construction or repeated emergency repair activity. The fish will find a place to spawn away from the activity. They have done in the past.

Should the project be done? Yes, the Upper Hoh River Road is important to residents, visitors, resource utilization and protection and the economy far beyond the river drainage.

Please proceed with the project as intended, allowing for effects of natural events.

Sincerely,

John C. Richmond
1702 Owl Creek Rd.
P.O. Box 536
Forks, WA 98331

Comment Letter 10

Katie Carroz

From: Morrow, Stephen (FHWA) <stephen.morrow@dot.gov>
Sent: Thursday, September 01, 2016 5:19 PM
To: Gray Rand; Loftsgaarden, Kirk (FHWA)
Cc: Katie Carroz; Leon, Sven A (FHWA)
Subject: RE: Parcel ownership maps

All:

I had a good phone conversation with Mike Hagan at the Hoh River Trust earlier this afternoon. Overall, HRT is very much in support of the proposed project, but had some concerns. The HRT will submit a letter formally identifying the concerns, but here's a summary:

- Concern about large tree removal. HRT wants to establish & enhance murrelet habitat (large conifers). I explained that the project will limit to what it can removal of large conifer trees. I told him I thought it was something on the order ~20 large conifer (had to check the BA after the phone call – I think that's right, yes?). Also explained part of the purpose and need of the project is to prevent future degradation of the riverbanks and further loss of the old growth conifers, which he agreed.
- Property Maps in the EA – not very accurate. HRT recommends getting the Jefferson County Assessor's maps (thanks Gray for the great GIS maps today!)
- Access during construction – easements from HRT are difficult to obtain → any easement must also be approved & signed off by USFWS and DNR. HRT has extended/expanded existing Jefferson County easements to accommodate previous Jefferson County bank stabilization projects. Will also have to obtain construction access permits to work on or go through HRT land during construction
- Tower Creek Bridge – one corner of the proposed bridge has 4 landowners: HRT, WA DNR, Jefferson County, NPS
- Schmidt Bar – HRT has lost ~80 acres of forest from the river reclaiming land through its meanders. HRT recognizes this is a dynamic river, the concern is that just downstream of the ELJ's at C1 – just downstream of Willoughby Creek is a remnant stand of old growth on the HRT Schmidt Bar property. HRT concern is the possibility the protection work could potentially direct flow into that stand and accelerate the erosion & tree loss

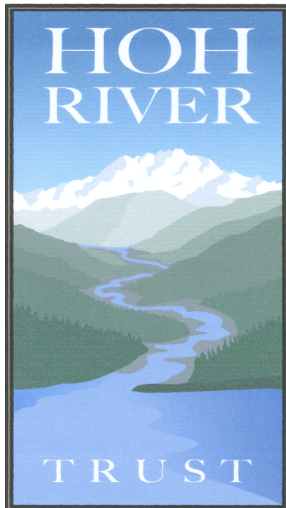
Comment/concern he relayed to me, not HRT...

- Peak 6 Tours (Gary Peterson) concern the ELJs could be navigation hazards for recreational rafting

On September 20 (3rd Tuesday) the resource agencies, NGO's and other local groups have a regular meeting at the Forks ONRC, they would be interested in hearing from us.... Perhaps we can discuss this next week.

STEVE MORROW

Environmental Protection Specialist
FHWA (Western Federal Lands)
610 E 5th Street
Vancouver, WA 98661
(360) 619-7811
stephen.morrow@dot.gov



Michael Hagen
Executive Director
P.O. Box 3068
Port Angeles, WA 98362
Cell: 360-908-0311
mhagen@hohrivertrust.org

Sept 20, 2016

Mr. Kirk Lofsgaarden
Western Federal Lands Highway
Federal Highway Administration
610 E. Fifth Street
Vancouver, Washington 98661

Comments on the Western Federal Lands Highway Division of the Federal Highway Administration (WFLHD) Upper Hoh River Road Bank Stabilization Project

Thank you for the opportunity to comment on the proposed project on the Upper Hoh River Road in western Jefferson County.

HRT is impacted as much as anybody else by the frequent washouts of the County road, as well as the repairs which follow. We are in favor of a one time fix which could end this yearly waste of time, resources and money.

We will focus on worksites that fall on our ownership and then look at landscape level aspects of the proposed project.

Background: The Hoh River Trust (HRT) was formed in 2005 to preserve from development and restore a forested river corridor reaching from the interior Olympic National Park boundary to the coast. We currently own close to 7000 acres along the river, some of it adjacent to the proposed project. Funding for our project was obtained via grants from the U. S. Fish and Wildlife Service (and others). Our management plan was co written with the U. S. Fish and Wildlife Service. We plan to restore suitable habitat for Federally listed species including Marbled Murrelet, Northern Spotted Owl and Bull Trout. We also protect Bald Eagle habitat under our own more restrictive conditions (the old Federal rules) rather than what is now allowed under Washington State protocols. While we use restoration forestry techniques and allow suitable public use and recreation - we are basically a wildlife refuge.

Many of the practices proposed in this draft – especially the extensive pile driving- would require our consultation with U. S. Fish and Wildlife Service if we had proposed them. We will concur with the results of the formal consultation conducted by the project proponents.

We are also limited by many Washington DNR Riparian Open Space Conservation Easements (each covering different areas) which limit development of new roads, structures, new easements, operation of rock pits, new subdivision and even aged stand management beyond that allowed in our management plan. We can not sell our land or allow its purpose to change, without repayment of funds. Major changes to existing easements or new easements will have to be negotiated with our funding agencies and may require condemnation.

HRT, along with the Hoh Tribe, was an early participant in this planning process and attended the sessions at the Olympic National Park Headquarters. Much valuable input was made and is now seemingly forgotten. HRT feels that this plan is much better than earlier proposals which featured extensive bank armoring using large riprap. However, as an affected Landowner at at least two and possibly three work sites (depending on verification of property lines and final plans), HRT has some concerns and comments about this version of the project.

The colored exhibit showing work sites does not show the “large wood debris jam” (lwd jam) installation at the upper end of Site c4. (page 241 of the Plan) While this is an ideal location for a very substantial jam, this is on HRT ownership and will necessitate removing some large trees, some of which look like suitable Murrelet nesting habitat and Bald eagle roosts. Shifting the location a bit may spare the largest trees. Any trees taken should be added to the lwd jam or left free to float in the river. The cleared site should be revegetated with large stock and have appropriate surface and slope restoration. Soil, bark, mulch and seed should be certified weed free. We and our partners have spent years, large sums of money and much physical effort to control noxious weeds on the Hoh.

This site is quite likely to have shallow alluvium or glacial till over bedrock. Pile driving using wooden piles may be a problem.

The property line with the U. S. Forest Service is nearby. USFS management here is for Late Seral Stage restoration.

This site is located adjacent to and across from a well used Chinook spawning bar which runs from the mouth of Pole Cr. down to Tower Cr. The “Koontz” bar, just upstream, is also a regular spawning site. All these bars shift yearly.

The downstream portion of c4 shows three lwd jams which will also protect the mouth of Tower creek. These lie on former HRT land, which is now under the active channel. This reach is a high stress location during winter flood events. Fish passage into Tower creek (as is true of all the north bank streams entering the Hoh) was dependent on a wide alluvial fan left from debris torrents issuing from Tower Cr. These deposits were washed away last year but can be expected to rebuild (See Bureau of Reclamation Report). These lwd jams should not only protect bridge infrastructure but encourage sediment deposition to rebuild the steep creek entrance.

The c3 site is located near a common property corner with the U. S. Forest Service, HRT, Jefferson County and the Upper Hoh road right of way. Depending on where

construction and clearing may take place, quite a few suitable Murrelet trees may be taken. As before, we prefer that these be put into low jams or the river.

Site c5 at Canyon Creek is, in our opinion, the lowest priority of the work sites. The culvert has a lot of life left in it and restoring fish access to the upper stream will not be much of a gain. It's a small system, steep and gets fine sediment runoff from the nearby rock pit. The lower end of Canyon creek- actually a semi stable side channel system- has supported a very productive juvenile salmon nursery for decades. Anchoring (or enhancing) the natural logjams at the upper end of the river bar would be part of some real mitigation for construction impacts to fish populations in the river and may help to restore fish access to Spruce cr, just downstream. It should be noted that across the river on the Huelsdonk/ Fletcher ranch side, there is an old embedded rip rap wall which protects the ranch.

This site (c5) is adjacent to a well known deep seated slope instability.

If the bridge is built as planned, we would prefer that it not have firm grade controls or riprap set into the stream bed. The stream needs to regrade naturally to allow accumulated sediment to pass through and fish to pass up. Bridge footings should be set accordingly. As at other sites, we would like the conifer wood within the clearing limits to be put into the creek.

On a landscape scale:

- Long Term Monitoring (by either WDFW and the Hoh Tribe) needs to be incorporated as part of this project.
- This variety of LWD jam is experimental but looks promising. We all have a problem securing large enough logs with rootwads to function in LWD projects. HRT is curious (and concerned) about what these structures may become after the small diameter wood involved decomposes and nothing is left but dolosse and steel cable. If these become hazards, who will remove them? What will be the eventual impact on river rafters and drift boats?
- Boat launches are in short supply. The community has lost put-ins at Canyon Cr, Spruce Cr., Minnie's bar and Koontz bar.

On the positive side:

- We are in favor of naturally recruiting log jams which encourage deposition of sediment to form stable, vegetated river bars. Jams should be designed to catch and hold floating LWD and operate without the need for maintenance.
- We are opposed to extensive rock armor, especially that which is put in during emergency repairs to road washouts. These are seldom mitigated and even when revegetated do not substitute for forested riparian habitat.
- We are in favor of removal of existing riprap / bank armor in areas where there is undeveloped land in long term open space management.

Thank you for your time and consideration,

Michael Hagen
Hoh River Trust

Comment Letter 11



File Code: 1560
Date: September 9, 2016

Kirk Loftsgaarden
Project Manager
USDOT, Federal Highway Administration
Western Federal Lands Highway Division
610 East Fifth Street
Vancouver, WA 98661-3801

Dear Mr. Loftsgaarden;

I wish to make the following comments regarding the Upper Hoh River Road Phase 2 project.

- I am generally supportive of the project and its pro-active approach to deal with these issues before they become an access emergency and a resource issue for fisheries.
- The land ownership boundaries are not clearly displayed in the maps and in some cases do not accurately represent USFS ownership. Efforts will need to be made to resolve the correct boundaries so that it is clear which (if any) parts of the activities will occur on National Forest System lands.
- A small edit is needed on Page 1-3 , which shows the Olympic National Forest under the US Department of Interior with the Park Service. This should be changed to the US Department of Agriculture for the Forest Service.
- I support the use of wood in combination with the dolosse in regards to benefits for fish habitat.
- The downstream end of site C-4 could be assessed for additional numbers of the wood/dolosse units. With the energy of the river along the Tower Creek bank, a small number of wood/dolosse units there could leave the bridge crossing on Tower Creek vulnerable to the force of the mainstem Hoh. Additional units could help protect the investment of the new bridge and allow for improved fish passage into Tower Creek at lower flows with deposition of material at the mouth. These efforts could have impacts on adjacent National Forest System lands.



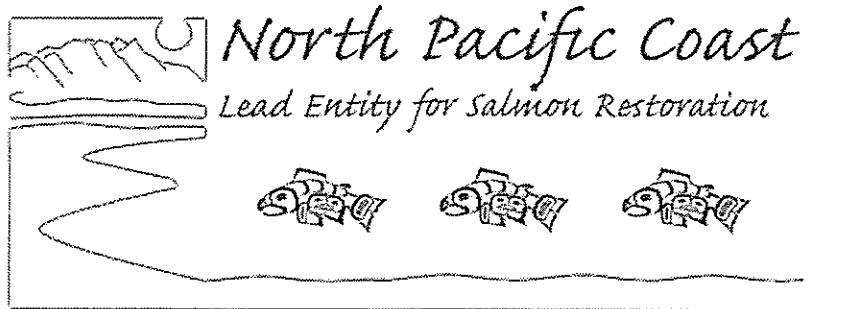
Please feel free to contact me at (360) 374-1222 or drmillett@fs.fed.us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean R Millett". The signature is fluid and cursive, with the first name "Dean" and last name "Millett" clearly distinguishable.

DEAN R MILLETT
District Ranger

Comment Letter 12



September 23, 2016

Mr. Kirk Lofsgaarden
Western Federal Lands Highway
Federal Highway Administration
610 E. Fifth Street
Vancouver, Washington 98661

Re: Project# WA JEFF 91420(1)
Comments on the Upper Hoh River Road Bank Stabilization Project Environmental Assessment

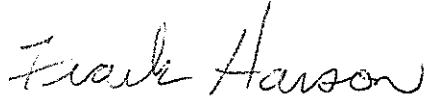
Thank you for the opportunity to comment on the proposed project on the long-term bank stabilization solutions along the twelve-mile portion of the Upper Hoh River Road in western Jefferson County. The following remarks are on behalf of the North Pacific Coast Lead Entity (NPCLE), a Washington State statutory committee created to preserve, protect, and restore salmon habitat, and comprised of two county governments, one incorporated city, and three federally recognized Native American Tribes with jurisdictional responsibilities inside Water Resource Inventory Area 20. This group also includes designated citizens to represent key stakeholder groups in our area. Several of our stakeholders and governments with in WRIA 20's NPCLE have shared some concerns which I will list. They may also comment from their specific organization or as individual concerned citizen.

Collective concerns:

1. Boat access sites on the Upper Hoh Road at MP 4 and MP 9.5 (above Willoughby Creek, and Spruce Creek) have been eliminated by river migration. These, had been important access points for treaty fishermen, state recreational fishers, and other users including rafting guides and restoration project sponsors.
2. Construction and its impacts need to be mindful of private, federal, state, local, and tribal interests and potential direct or indirect impact to same. All affected parties must be given notice at each opportunity.
3. Please collaborate with state or tribal governments to create a map of critical salmon spawning areas to assure their protection during construction, or if impact is unavoidable, harmed as little as possible. Remediation may be necessary.
4. Contact the state and tribal fisheries managers in order to adjust timing of in-river work to correspond to the protection of fish, especially migration and spawning.
5. Increase roughening along rip-rap reaches between RM 7.5 and 7.7, with, e.g., dolosses, wood, or other construction methods.
6. After work is completed, monitoring should be continued for a minimum of five years will be necessary to evaluate the return to background conditions for water and gravel quality. Please provide me with all links for updates on the progress of this project so these links can be shared with other NPCLE members.

On the last comment: We understand that time and funding may mean we can only get the public updates by Internet links. However, we would greatly appreciate you or a representative at our monthly meetings or to receive a written update on the Upper Hoh River Road Project for our monthly NPCLE meetings. Our stakeholders and governments are legitimately concerned and feel they have time, talent, and experience to bring positive input to your project's ongoing development. Our meetings are scheduled for the 3rd Tuesday of each month at 1 p.m., at the Olympic Natural Resources Center in Forks, Washington (road entrance is across from Forks' airport on US 101). The next regular scheduled meeting is Tuesday, Nov 15th. Thank you for your time and energy during this process.

Sincerely,

A handwritten signature in cursive script that reads "Frank Hanson".

Frank Hanson, Education, Outreach, & NPCLE Facilitator
Olympic Natural Resources Center
School of Environmental and Forest Sciences
College of the Environment
P.O. Box 1628 Forks, WA 98331
Office 360-374-4556 Cell 360-640-1861
fsh2@uw.edu

Comment Letter 13



HOH INDIAN TRIBE

PO BOX 2196 • FORKS, WASHINGTON 98331
TELEPHONE [\(360\) 374-6582](tel:(360)374-6582) • FAX [\(360\) 374-6549](tel:(360)374-6549)

September 10, 2016

Kirk Loftsgaarden
Federal Highway Administration (FHA)
Western Federal Lands Highway Division
610 East Fifth Street
Vancouver, WA 98661-3801

Regarding: Upper Hoh River Road Projects

Dear Mr. Loftsgaarden,

Thank you for considering the Hoh Tribe's comments regarding the Upper Hoh Road Project(s) scheduled for the summer of 2017. We can appreciate the difficult erosional issues associated with trying to maintain road infrastructure adjacent to this dynamic and powerful rain-dominated, alluvially-bedded coastal river. We offer these general comments related to the project planning, design and documentation including the draft Environmental Assessment and 30% design detail plan set. We also offer more specific comments and recommendations related to the fishery resources of the Hoh River which will be impacted during the project and forward into perpetuity.

Environmental Assessment (David Evans and Associates, INC. July, 2016)

- The Hoh Tribe is not a stakeholder (as listed p.1-3), the Hoh Tribe is co-manager and owner of the fisheries resources impacted by this project. The Hoh Tribe Department of Natural Resources could be correctly identified and consulted appropriately as the fisheries resource managing agency.
- There is no mention of fish exclusion in the work plans (p.3-5). Plans to remove fish from all work sites and exclude fish during construction must be developed during planning and implemented during construction. We need to discuss specific methods to be applied for fish removal and fish exclusion. Hoh Tribal staff will be available to develop fish removal and exclusion plans to assist. Hoh Tribal staff will be available to help in the fish removal activities throughout construction.
- In Appendix E, "Biological Survey" the fish species list appears incorrect and incomplete. Giant Pacific Lamprey, Southern Green Sturgeon and Eulochon are all ESA listed fish found in the Hoh River. Western Cutthroat Trout does not occur in the Hoh River, though Coastal Cutthroat Trout do occur.
- Property ownership maps are not accurate in the documents provided, namely Hoh River Trust ownership adjacent to site C4
- Hoh Tribe was not consulted by either National Marine Fisheries Service (NMFS) or U.S. Fish and Wildlife Service (USFWS) during the federal project review. With proposed activities,

particularly pile driving, requiring review by USFWS, we anticipated consultation with regards to their biological opinions

- Hoh Tribe disagrees with “Environmental Baseline” assertions, table 6. Page 24 regarding Habitat Elements and Watershed Conditions incorrectly characterized as “PF” properly functioning include: “Large Pools”, “Off-channel habitat”, “Refugia”. None of these habitats are properly functioning. Hoh River staff were not consulted as to these subjective opinions and subsequent assertions were generated without Hoh Tribal input. We object to the characterization of the “environmental baseline.”
- Strongly disagree with “Analysis of Effects” table 11, Page 38 of the Biological Assessment. Assertions made in this section appear incorrect and not supported by data, for example:

Large Woody Debris will not be improved by bank stabilization. The project will eliminate natural recruitment of wood into the system. Dolosse may recruit wood if installed correctly, but this wood will already be in the system. These projects will reduce natural recruitment of wood where bank stabilization has occurred

Large Pools will not be maintained by this project, and this habitat is not functioning properly on the Hoh River.

Off-channel Habitat will not be maintained by this project. We understand that bank armoring and stabilization as proposed in this project will have the effect of entraining the river immediately adjacent to the rip-rap. Particularly at sites C2 and C4 the effect will be the opposite, off-channel habitat will be reduced, not maintained. Also, this habitat type is not functioning properly.

Refugia will not be improved, we consider off-channel habitat to be refugia. Access to off-channel refugia will be destroyed by the installation of bank stabilization systems. The dolosse are not Engineered Log Jams (ELJ), and though dolosse may offer more complexity than rip-rap alone, we must remember that the initial, natural complexity in these areas was destroyed when the road was installed. The net result of the upper Hoh road is a loss in near-bank refugia and access to off-channel refugia. This subjective and unsubstantiated “analysis of effects” is flawed at many points. Bull Trout “Subpopulation size” will not be “improved in the long term” by this project. This assertion is unproven. Bank Stabilization destroys habitat by causing the river to become entrained, promoting depth and scouring, reducing the capacity for natural meander. Furthermore, kinetic energy is drastically increased adjacent to bank stabilization, and downstream impacts include scouring of redds, loss of property and further destruction of off-channel spawning habitat and overwintering refugia. We have seen this process occur on multiple occasions. The “analysis of effects” is incorrect.

Width to Depth Ratio will be compromised at all sites with bank stabilization, however the analysis only considers the bridges, not the bank stabilization.

Streambank conditions are destroyed, they are not improved when streambanks are “stabilized”. Who thinks this? Please see the above comment regarding river entrainment, kinetic energy, scouring, loss of off-channel habitat, loss of natural wood recruitment... This analysis is simply incorrect.

- Table 12, response and Exposure matrix is also incorrect. For example, the “Potential Stressor” section is incomplete. Installation of ELJ’s with any pile-driving will be a stressor on fish in the area. The adjacent gravel will be filled with wild steelhead eggs and alevin in addition to juvenile steelhead, juvenile bulltrout, juvenile cutthroat, juvenile chinook, juvenile coho, sculpin,

juvenile giant pacific lamprey, western brook lamprey, whitefish in addition to adult chinook, coho, cutthroat, bulltrout and steelhead.

- Appendix A of the Biological Assessment is incorrect in the assertion that “Bank stabilization will likely improve habitat functions for these salmonids in the long term”. For all the reasons stated above, bank stabilization has negative impacts upon salmon habitat for the long-term. Normal riparian function will be compromised, the river will be entrained, kinetic energy increased and downstream habitat destruction and scouring will be promoted. This constitutes long-term habitat failure.

Design Comments

- We are encouraged that FHA is considering a repair to the road using more than rip-rap exclusively, and though dolosse may offer more complexity and potential to grow log-jams by recruiting wood, they must be located in the water in order to recruit and function properly. Dolosse should be placed below road grade, such that they are able to function properly. It appears on some designs that the dolosse placement is at road grade, they must be lower to facilitate the proposed objective.
- During previous ELJ projects on Highway 101 there were massive installations with steel pilings driven to 40 foot depth. Your design which calls for wooden pilings to be driven 10 feet will not be sufficient. The wood will shatter upon hitting bed-rock. 10 feet is not deep enough. The road should be relocated in the areas of C2 and C4 as a long term strategy, otherwise much larger ELJ installations similar to those located on highway 101 will be required. Until then we are concerned that more rip-rap will be needed to replace that which will inevitably fall into the river and the deep channel that will be developed adjacent to the rip-rap. The associated increase in kinetic energy is extremely detrimental to fish and habitat stability. Have we learned these lessons along the Hoh already?

Species Specific Comments

Spring/Summer Chinook

- Native Spring/Summer Chinook are a stock of critical concern, with chronic under-escapement this highly prized run of wild fish has been the most constraining to Hoh Tribal Fisheries over the past decade.
- The majority of spawning will happen above the worksite, from early September through mid-October. Therefore almost 1000 wild chinook must pass beyond all 5 work sites. It is critical that a fish-passable corridor be maintained adjacent to all work stations. Working should not occur during crepuscular or night-time hours, as this is the time chinook are most likely to be migrating past the work sites.
- Careful consideration of technology or techniques which might reduce the negative impacts of pile driving upon wild chinook would be appreciated.

- Fish removal must occur at all locations, and fish exclusion must be maintained throughout the work period.
- All locations will be rearing habitat for juvenile chinook, including spring/summer stock. Therefore fish removal and fish exclusion is important for juvenile chinook
- Sites C2 and C4 are located where there is a history of wild chinook spawning. Therefore there may be spawning activity immediately adjacent to these locations at the end of the work window. Must be vigilant to avoid impacting active spawning behavior.
- Site C5, though valuable, is not mitigation for damage to chinook habitat. Therefore alternatives need to be developed as mitigation. The Hoh Tribe has several ideas we would like to discuss.

Winter Steelhead

- Wild winter steelhead are likely to be impacted to the greatest extent by the proposed projects primarily because there is very dense spawning activity adjacent to sites C2 and C4, in particular C4 is located on the river the MOST DENSE spawning activity in the entire system (see attached maps of spawning distribution). There may be over 40 wild steelhead redds in the IMMEDIATE VICINITY. There will be fertilized eggs and viable alevin and fry in these redds during the beginning of the work window. Contractors must be vigilant as the in-water work locations may be immediately adjacent to redds, if not super-imposed. In the event that there are viable steelhead redds at the work sites, the Hoh Tribe expects FHA and the contractors to consult immediately with Hoh Tribal Staff and WDFW staff to develop a strategy in order for the project to move forward.
- Juvenile steelhead will occur at all work sites during the entire duration of the project. There will be young of the year, yearling and two and three year old juveniles. Four age cohorts will be represented in the juvenile fish utilizing all 5 work sites. Fish removal and fish exclusion must be better defined and coordinated. We can help.

Coho

- Historically abundant, the coho population crashed in 2015. The Hoh Tribe was forced to close our coho fishery in 2015, and again in 2016 as a response to the unprecedented low abundance. Returns in 2015 failed to achieve minimum spawning escapement, and our snorkeling surveys in the summer of 2016 revealed all-time low abundance. The Hoh Tribe coho directed fishery was closed in 2016. Therefore the juveniles produced by these valuable adult returns will be found during the summer of 2017 at the work site. Again, fish removal and fish exclusion must be defined and coordinated at all work locations. The Hoh Tribe is willing to help with these efforts.

Thank You for considering our comments. We have included maps with additional comments and data supporting our assertions regarding spawning fish for your consideration. We look

forward to working with you to achieve success managing this difficult situation we all must face.

Sincerely,

Joseph Gilbertson, Primary Contact

Fisheries Management Biologist, Hoh Tribal Department of Natural Resources

[360-374-6737](tel:360-374-6737)

[360-928-5200](tel:360-928-5200)

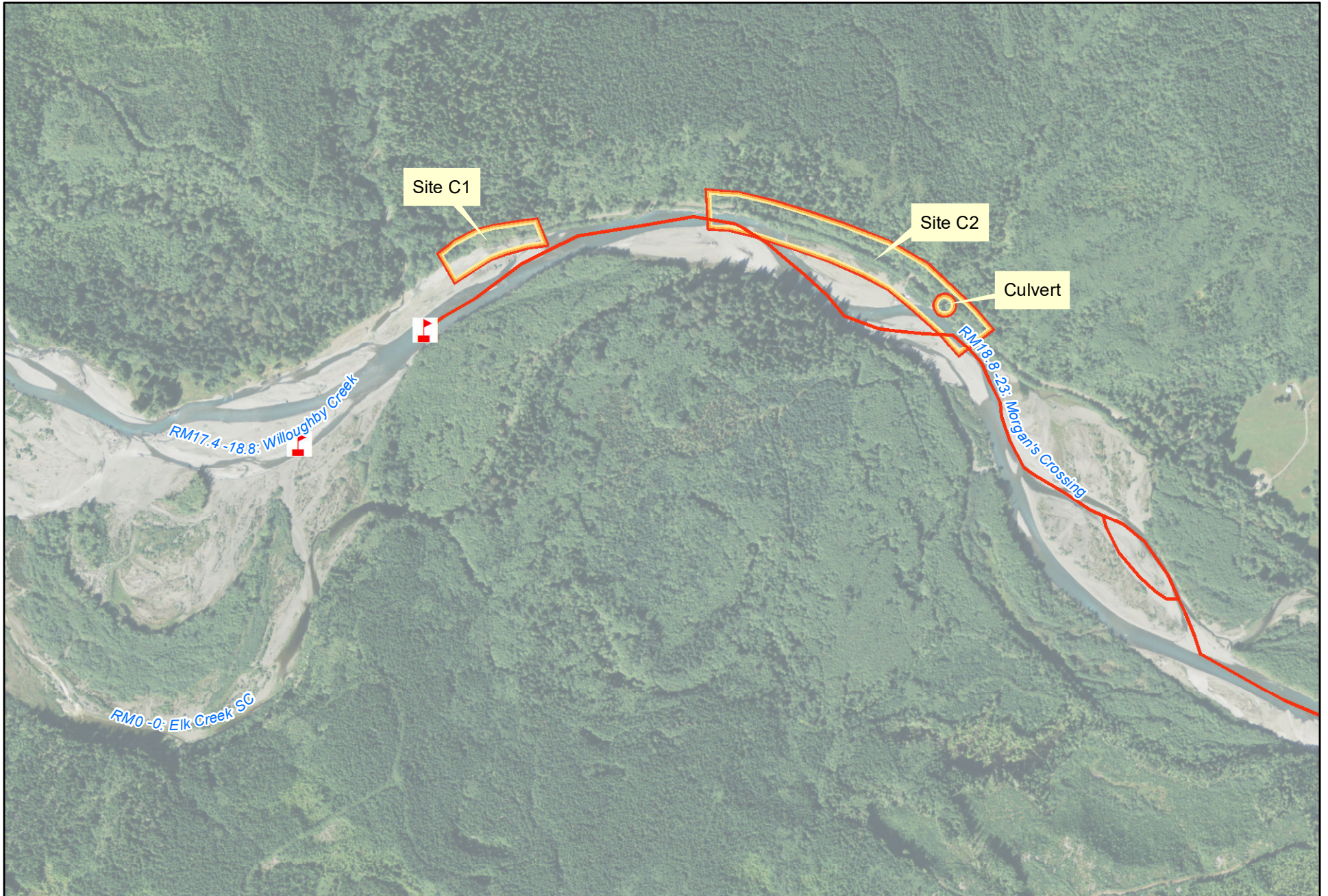
Bernard Afterbuffalo






Fisheries Habitat, Waterquality technician, Hoh Tribal Department of Natural Resources

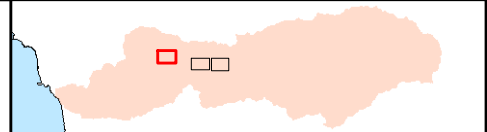
Hoh Tribal Council

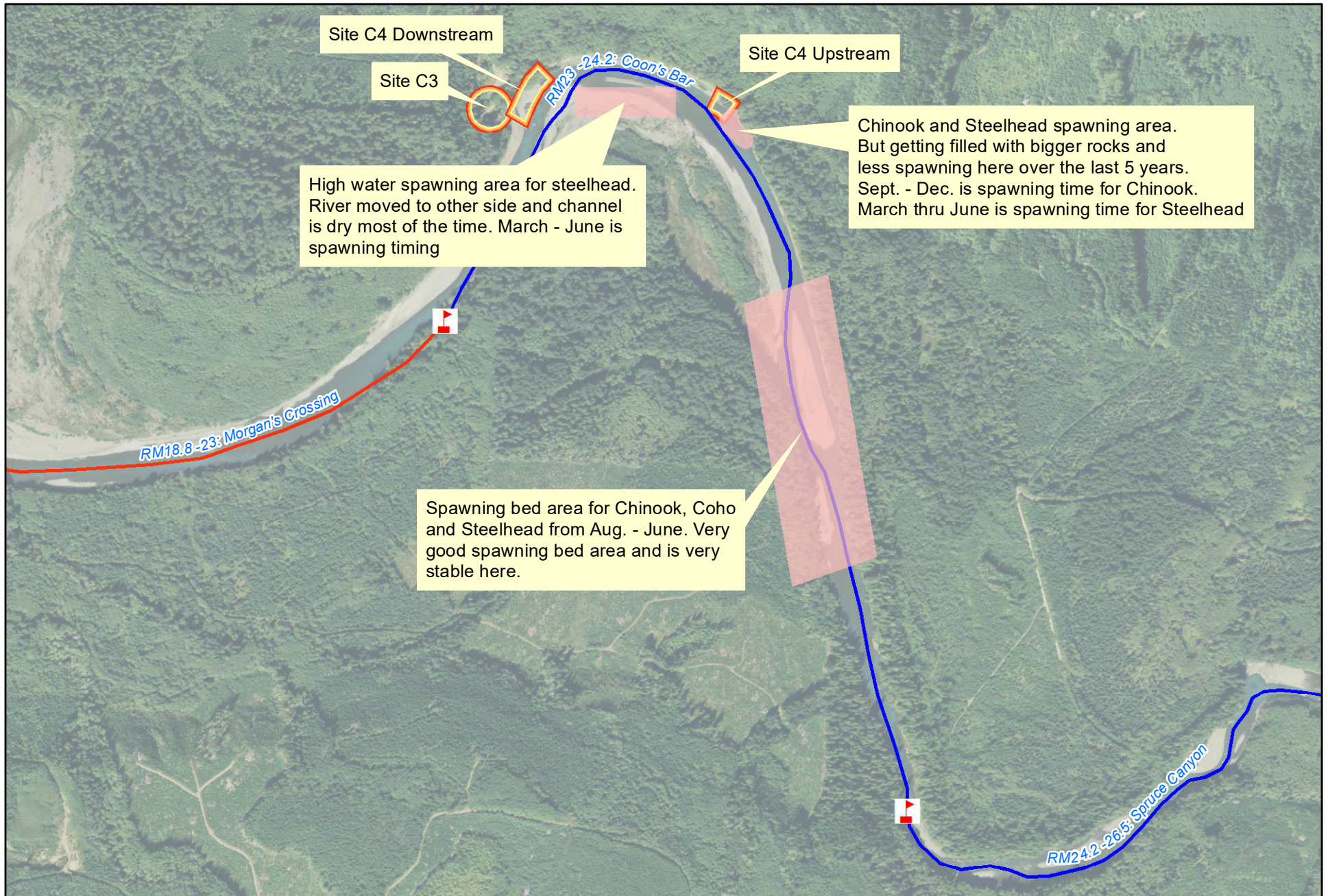
Nicolas Pfeffer-Taggart


GIS, Computational Biology, Technology Specialist, Hoh Tribal Department of Natural Resources

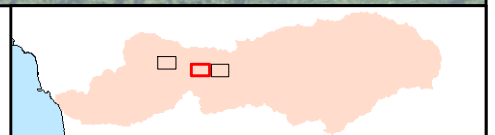


-  FHA Project Locations
-  Spawning Beds/Habitat Notes
-  Survey Reach Limits
-  Morgan's Xing to Willoughby Cr.
-  ONP Boundary to Morgan's Xing





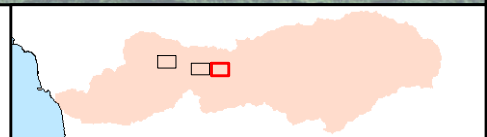


-  FHA Project Locations
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-  FHA Project Locations
-  Spawning Beds/Habitat Notes
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Reach	Species	Run	Lower RM	Upper RM	Year	Redds/Mile	Reach Esc. (Fish)	Hoh Mainstem ESC	Hoh System Esc. (Fish)	Reach % of Hoh MS Esc	Reach % of Hoh System Total Esc.
Morgan's Xing to Willoughby Cr.	STHD	Winter	18.8	23.0	2016	18.3	154	1540	2227	10.0%	6.9%
	STHD	Winter	18.8	23.0	2015	31.7	266	2442	3171	10.9%	8.4%
	STHD	Winter	18.8	23.0	2014	10.7	90	1088	1786	8.3%	5.0%
	STHD	Winter	18.8	23.0	2013	30.5	256	1366	2302	18.7%	11.1%
	STHD	Winter	18.8	23.0	2012	18.6	186	2188	3221	8.5%	5.8%
	STHD	Winter	18.8	23.0	2011	20.6	223	2240	3500	9.9%	6.4%
	STHD	Winter	18.8	23.0	2010	20.2	190	1562	2234	12.2%	8.5%
2010 - 2016 AVG.						21.5	195	1775	2635	11.2%	7.4%
ONP Boundary to Morgan's Xing	STHD	Winter	23.0	29.7	2016	24	161	1540	2227	10.5%	7.2%
	STHD	Winter	23.0	29.7	2015	38	253	2442	3171	10.4%	8.0%
	STHD	Winter	23.0	29.7	2014	21	139	1088	1786	12.8%	7.8%
	STHD	Winter	23.0	29.7	2013	13.8	184	1366	2302	13.5%	8.0%
	STHD	Winter	23.0	29.7	2012	36	0	2188	3221	0.0%	0.0%
	STHD	Winter	23.0	29.7	2011	28.3	378	2240	3500	16.9%	10.8%
	STHD	Winter	23.0	29.7	2010	19.4	130	1562	2234	8.3%	5.8%
2010 - 2016 AVG.						25.8	178	1775	2635	10.3%	6.8%
Willoughby Cr. to ONP Boundary	STHD	Winter	18.8	29.7	2016	42.3	315	1540	2227	20.5%	14.1%
	STHD	Winter	18.8	29.7	2015	69.7	519	2442	3171	21.3%	16.4%
	STHD	Winter	18.8	29.7	2014	31.7	229	1088	1786	21.0%	12.8%
	STHD	Winter	18.8	29.7	2013	44.2	440	1366	2302	32.2%	19.1%
	STHD	Winter	18.8	29.7	2012	54.6	186	2188	3221	8.5%	5.8%
	STHD	Winter	18.8	29.7	2011	48.9	601	2240	3500	26.8%	17.2%
	STHD	Winter	18.8	29.7	2010	39.6	320	1562	2234	20.5%	14.3%
2010 - 2016 AVG.						47.3	373	1775	2635	21.5%	14.2%
Morgan's Xing to Willoughby Cr.	CHIN	Spring	18.8	23.0	2015	4.7	19.8	877.5	1070	2.3%	1.9%
	CHIN	Spring	18.8	23.0	2014	2.5	11	465	744	2.3%	1.4%
	CHIN	Spring	18.8	23.0	2013	4.5	19	312.5	750	6.1%	2.5%
	CHIN	Spring	18.8	23.0	2012	9.5	40	438	764	9.1%	5.2%
	CHIN	Spring	18.8	23.0	2011	Ins. Data	Ins. Data	773	832	Ins. Data	Ins. Data
	CHIN	Spring	18.8	23.0	2010	Ins. Data	Ins. Data	540	828	Ins. Data	Ins. Data
	2010 - 2015 AVG.						5.3	22	568	831.3	4.9%
ONP Boundary to Morgan's Xing	CHIN	Spring	23.0	29.7	2015	10.6	71.1	877.5	1070	8.1%	6.6%
	CHIN	Spring	23.0	29.7	2014	5.5	37	465	744	8.0%	5.0%
	CHIN	Spring	23.0	29.7	2013	1.6	11	312.5	750	3.5%	1.5%
	CHIN	Spring	23.0	29.7	2012	5	34	438	764	7.8%	4.5%
	CHIN	Spring	23.0	29.7	2011	6.7	45	773	832	5.8%	5.4%
	CHIN	Spring	23.0	29.7	2010	4.0	27	540	828	5.0%	3.3%
	2010 - 2016 AVG.						5.6	37.5	567.5	831.3	6.4%
Willoughby Cr. to ONP Boundary	CHIN	Spring	18.8	29.7	2015	15.3	90.9	877.5	1070	10.4%	8.5%
	CHIN	Spring	18.8	29.7	2014	8.0	47.6	465	744	10.2%	6.4%
	CHIN	Spring	18.8	29.7	2013	6.1	30.0	312.5	750	9.6%	4.0%
	CHIN	Spring	18.8	29.7	2012	14.5	74.0	438	764	16.9%	9.7%
	CHIN	Spring	18.8	29.7	2011	Ins. Data	Ins. Data	773	832	Ins. Data	Ins. Data
	CHIN	Spring	18.8	29.7	2010	Ins. Data	Ins. Data	540	828	Ins. Data	Ins. Data
	2010 - 2016 AVG.						11.0	60.6	567.5	831.3	11.8%

Morgan's Xing to Willoughby Cr.	CHIN	Fall	18.8	23.0	2015	7.4	77.5	793	1795	9.8%	4.3%
	CHIN	Fall	18.8	23.0	2014	Ins. Data	Ins. Data	Ins. Data	1938	Ins. Data	Ins. Data
	CHIN	Fall	18.8	23.0	2013	22.4	235	1021	1586	23.0%	14.8%
	CHIN	Fall	18.8	23.0	2012	Ins. Data	Ins. Data	1714	2488	Ins. Data	Ins. Data
	CHIN	Fall	18.8	23.0	2011	8.3	97.5	684	1283	14.3%	7.6%
	CHIN	Fall	18.8	23.0	2010	Ins. Data	Ins. Data	548	2347	Ins. Data	Ins. Data
2010 - 2015 AVG.						12.7	136.7	952.0	1906.2	15.7%	8.9%

ONP Boundary to Morgan's Xing	CHIN	Fall	23.0	29.7	2015	Ins. Data	Ins. Data	793	1795	Ins. Data	Ins. Data
	CHIN	Fall	23.0	29.7	2014	Ins. Data	Ins. Data	Ins. Data	1938	Ins. Data	Ins. Data
	CHIN	Fall	23.0	29.7	2013	14.6	245	1021	1586	24.0%	15.4%
	CHIN	Fall	23.0	29.7	2012	25	420	1714	2488	24.5%	16.9%
	CHIN	Fall	23.0	29.7	2011	8.4	140	684	1283	20.5%	10.9%
	CHIN	Fall	23.0	29.7	2010	16.2	270	548	2347	49.3%	11.5%
2010 - 2016 AVG.						16.1	268.8	952.0	1906.2	29.6%	13.7%

Willoughby Cr. to ONP Boundary	CHIN	Fall	18.8	29.7	2015	Ins. Data	Ins. Data	793	1795	Ins. Data	Ins. Data
	CHIN	Fall	18.8	29.7	2014	Ins. Data	Ins. Data	Ins. Data	1938	Ins. Data	Ins. Data
	CHIN	Fall	18.8	29.7	2013	37.0	480.0	1021	1586	47.0%	30.3%
	CHIN	Fall	18.8	29.7	2012	Ins. Data	Ins. Data	1714	2488	Ins. Data	Ins. Data
	CHIN	Fall	18.8	29.7	2011	16.7	237.5	684	1283	34.7%	18.5%
	CHIN	Fall	18.8	29.7	2010	Ins. Data	Ins. Data	548	2347	Ins. Data	Ins. Data
2010 - 2016 AVG.						26.9	358.8	952.0	1906.2	40.9%	24.4%

Comment Letter 14



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way N · Olympia, WA 98501-1091 · (360) 902-2200, TTY (800) 833-6388
Main Office Location: Natural Resources Building · 1111 Washington Street SE · Olympia, WA

September 23, 2016

U.S. Department of Transportation
Federal Highways Administration
Western Federal Lands Highway Division
Mr. Kirk Loftsgaarden, Project Manager
610 E. 5th Street
Vancouver, WA 98661

Dear Mr. Loftsgaarden,

Subject: Upper Hoh River Road – Environmental Assessment in Jefferson County, Washington

The Washington Department of Fish and Wildlife (WDFW) reviewed the Environmental Assessment (EA) dated July, 2016. The EA is the result of earlier meetings and conversations with constituents and stakeholders to develop a plan to protect the upper Hoh River Road. The WDFW is authorized under RCW 77.55.100 to regulate construction activities as proposed in the EA and encourage potential applicants to consult with us early in their planning process. We appreciate the opportunity to review and comment on the project proposal prior to submittal of a Hydraulic Project Application.

The WDFW appreciates the US Department of Transportation (USDOT) efforts to be proactive in their efforts to maintain access to the upper Hoh River in an environmentally sensitive manner. Maintaining access to the upper Hoh River poses many challenges in developing solutions that provide access and protect fish and wildlife at the same time. There are many examples from the last two decades when last minute emergency projects involved placing riprap in the river to prevent imminent loss of the road. Unfortunately, in many of these cases emergency funds only covered placement of the riprap and did not include any mitigation for impacts to fish or fish habitat. Some of this work continues to impact fish habitat to this day and many have not been mitigated due to the lack of funding.

It is our understanding bank stabilization is proposed at three locations in addition to replacement of three stream crossing structures for a total of six projects (Table 1).

Table 1 Project locations

Site	Action	milepost	river mile	length in feet	river bed displacement in square feet
C1	Bank protection	3.6-3.8	18.5-18.9	600	9,000
C2	Bank protection	4.0-4.4	19.1-19.5	2,100	35,000
C2/MP 4.38 culvert	Replace culvert	4.38	19.5		

C3 Tower creek	Replace bridge	7.5	23.3		
C4 East	Bank protection	7.5-7.6	23.3	400	6,000
C4 West	Bank protection	7.9	23.6	100	
C5 Canyon creek	Replace culvert with bridge	10.2	27.1		

We offer the following information and comments at this time and will provide additional comments as the opportunity and project designs progress.

Resources at risk:

We appreciate the level of thoroughness that went into the documentation of fish and wildlife resources in Section 4.6 of the EA. As mention in the EA, the Hoh River is home to a number of fish species including depressed spring/summer chinook, fall chinook, coho, chum, sockeye, steelhead and bull trout. All of these species are present in the mainstem of the river at some point in their life cycle. We expect adult spring/summer chinook and steelhead in the river during the part of the instream construction window. Juvenile salmonids and other aquatic species are present throughout the year and will also be impacted by construction activities.

We intended to provide chinook and steelhead spawner information to illustrate the proximity of spawning activity relative to the project sites but we were unable to acquire the information prior to this letter. We are willing to provide this information at a later date if you wish to have it. We discussed the EA with Hoh Tribal fish management staff since they are co-managers on the Hoh River. It is our understanding that they will be commenting to the EA and will be providing additional biological data, including spawning location information relative to the project sites.

Specific project site comments:

C2/MP 4.38 Culvert Replacement: WDFW supports this culvert replacement. The habitat gain would be 2,146 linear meters for searun cutthroat trout, resident cutthroat trout and steelhead (WDFW online fish passage barrier database). We are concerned a culvert may not function properly with changing river elevations over time since it is immediately adjacent to the river.

C3 Tower Creek Bridge: WDFW recognizes the need and supports the bridge replacement concept. WDFW does not support the design proposal of riprap in the stream channel, buried under streambed material as it disrupts natural stream processes.

C5 Canyon Creek Bridge: During earlier discussions, it was our understanding the final proposed projects were specifically identified to maintain the Upper Hoh River Road. Upon review of the EA, we learned the Canyon Creek project was included as mitigation for other proposed project impacts. We agree the Canyon Creek fish barrier correction is a good project. Replacing the Canyon Creek barrier will open up access to 1,491 linear meters of habitat that may be utilized by searun cutthroat, resident cutthroat and steelhead (WDFW online fish passage barrier database). Fish passage staff documented an impassable waterfall at 1,491 meters above the Upper Hoh River Road.

While certainly commendable, barrier correction at Canyon Creek does not mitigate impacts to adult spring/summer chinook and steelhead that will be present during the instream bank protection work. In particular, the barrier correction does not mitigate the loss of approximately

50,000 sq ft of Hoh River bed or the loss of approximately 3,200 linear feet of riparian area. It also does not mitigate construction impacts such as disturbance from pile driving or placement of wood and doloose structures. Appendix C from the Army Corps of Engineers (ACOE) meeting on July 18, 2015 indicated that for Canyon Creek to be considered mitigation, it would have to serve the same fish and habitats impacted by the project. Since the habitat upstream of the road crossing on Canyon Creek would not be utilized by chinook and provides limited use for winter steelhead, this would not be considered mitigation by WDFW, or ACOE based on the meeting notes.

Recommendations:

The WDFW offers the following recommendations to minimize and/or mitigate impacts to fish and fish habitat from construction of the proposed projects.

1. The combination use of doloose and wood structures is a relatively new technique to reducing river bank erosion. We recommend Federal Highways provide funding for long term monitoring and maintenance of the project sites. Climate change and the receding Hoh glacier are contributing to changes in river flow and sediment transport. This should be considered when developing a monitoring and maintenance plan. We also recommend this monitoring and maintenance plan be developed jointly with WDFW, Hoh Tribe and other interested stakeholders. It is imperative that maintenance of the structures be done in an expeditious manner; therefore Federal Highways should identify funding and responsible parties.
2. We are concerned the culvert installation at site C4 will not function over time as the river moves and bed elevation fluctuates. To improve the likelihood of success for long term fish passage, we recommend a bridge be installed at this location. A bridge is much less likely to require long term maintenance as the river continues to move around and the bed elevation changes.
3. We may have missed it in the report, but we did not see any mention of fish exclusion for instream work. We recommend adding a plan to exclude fish from the worksites during construction to minimize impacts to fish. Minimizing the impacts to fish also reduces the level of mitigation required for the project.
4. We encourage you to work with WDFW, Hoh Tribe and stakeholders to develop a mitigation plan that appropriately mitigates project impacts to fish and fish habitat. The meeting notes from the US Army Corps of Engineers in Appendix C of the EA, also contain ideas to mitigate project impacts and provide long term benefits for fish. Below are a couple of additional examples of alternative mitigation we believe could provide greater long term benefit to fish.
 - a. Fund research to evaluate and increase or improve existing off channel habitat.
 - b. Fund research to evaluate and implement alternatives to armoring the river which contributes to loss of habitat.
 - c. Floodplain land acquisitions that protect habitat.

Summary:

The WDFW appreciates the opportunity to provide technical assistance early in the design process which will facilitate quicker processing of the Hydraulic Project Application when the project enters the permitting stage. We have been a participant in earlier meetings to discuss options that would be proactive and maintain public access to the upper river. We strongly encourage you to re-examine the earlier alternative of relocating the road away from the river where appropriate. The Hoh River is a very dynamic river and all indications are that the river bed is aggrading. As bed material continues to aggrade in the river, the road will be under constant threat of erosion necessitating future bank stabilization projects to protect the road.

We would also point out that one of the limiting factors for the Hoh River is the loss of large wood which provides stream complexity and fish habitat. As long as the road exists in the riparian area of the river, it is unlikely trees will grow to substantial size and ultimately provide the needed wood. Without a healthy riparian area, the lack of large wood will continue to be a limiting factor. Any tree that falls across the road obviously needs to be removed to provide road access and these trees are cut into smaller pieces to facilitate removal.

Another strong point is that the Treaty Tribes of Washington produced a document titled “Treaty Rights at Risk”, and a document titled “State of Our Watersheds”. Both documents share tribal concerns about their ability to continue harvesting fish if we do not do a better job of protecting fish habitat. We have listed quotes below to illustrate their concerns; the first one speaks specifically to the Hoh River.

“There is a misconception that the Hoh watershed is relatively pristine and its fish stocks are healthy, but the system has been heavily impacted by timber harvests, road construction, infrastructure protection and other anthropogenic influences.” (2016 State of Our Watersheds Report Hoh River Basin, page 2)

“For more than two decades, harvest rates in all fisheries have been sharply reduced to compensate for the precipitous decline of salmon abundance in Washington state waters, but today harvest cuts can no longer compensate for losses in salmon spawning and rearing habitat.” (2016 State of Our Watersheds Report Hoh River Basin, page 14)

“We know that we cannot stop the massive population growth anticipated in this region over the coming decades, but we can ensure that the associated development is designed and implemented in ways that will better protect salmon and its habitat.” (Treaty Rights At Risk Ongoing Habitat Loss, the Decline of the Salmon Resource, and Recommendations for Change - July 14, 2011, page 7)

These few quotes illustrate the concerns of the Hoh Tribe and the Treaty Tribes of Washington. There are many other published documents produced by the restoration community and local stakeholders that voice similar concerns. Healthy and harvestable fish populations are an important social and economic driver in small communities like Forks, Washington.

For future projects, we encourage the USDOT to re-engage WDFW, Hoh Tribe, the local community and the many other stakeholders in new discussions to find solutions that provide long term protection of the river and maintain public access.

Thank you for the opportunity to provide these comments. If you have any questions, please contact me at 360-417-1434 or theresa.powell@dfw.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Theresa Powell', with a stylized flourish at the end.

Theresa Powell
Habitat Biologist

Cc:

Nicolas Pfeffer-Taggart, Hoh Tribe
Joe Gilbertson, Hoh Tribe
Lisa Turecek, NPS
Rebecca McAndrew, USACE
Marty Ackers, USFWS
Lori Kingsbury, WDOE
Bridget Kaminski-Richardson, WDNR
Monte Reinders, Jefferson County Public Works
Dave Kloempken, WDFW
Chris Waldbillig, WDFW
Franklin Hanson, NPCLE

References

Treaty Rights at Risk Ongoing Habitat Loss, the Decline of the Salmon Resource, and Recommendations for Change July 14, 2011.

2016 State of Our Watersheds Report-Hoh River Basin, Northwest Indian Fisheries Commission

Comment Letter 15

Katie Carroz

From: Loftsgaarden, Kirk (FHWA) <Kirk.Loftsgaarden@dot.gov>
Sent: Friday, October 14, 2016 12:44 PM
To: Morrow, Stephen (FHWA); Gray Rand
Cc: Katie Carroz
Subject: FW: Draft Upper Hoh River Road EA

FYI – another comment.

From: Eberlein, Mark [<mailto:Mark.Eberlein@fema.dhs.gov>]
Sent: Friday, October 14, 2016 11:24 AM
To: Loftsgaarden, Kirk (FHWA)
Cc: Love, Sharon (FHWA)
Subject: Draft Upper Hoh River Road EA

Mr. Loftsgaarden,

I received a notice about the Upper Hoh River Road Phase 2 Draft Environmental Assessment two weeks ago. I realize the comment period is over.

FEMA is currently reviewing several completed projects that Jefferson County has requested funding for on the Hoh River downstream of your project. It involved extensive riprap. I wanted you to be aware of this work for your evaluation of the baseline river conditions, particularly as it pertains to cumulative effects, with your proposed project.

Additionally, your draft EA stated that FEMA was involved in the scoping and interagency meeting last summer. Can you provide me with the name of the individual(s) that participated? I need to improve our internal coordination for these types of FHWA sponsored DOT activities to help ensure FEMA has the right participant(s) supporting DOT.

Thank you and please add me as the FEMA Region 10 Point of Contact for any future NEPA related requests for comment or participation from your office.

Sincerely,

Mark Eberlein
Regional Environmental Officer
FEMA Region 10
425 487 4735.

