U. S. Department of the Interior

National Park Service

RECORD OF DECISION

ELWHA RIVER ECOSYSTEM RESTORATION IMPLEMENTATION

FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

Olympic National Park, Washington

INTRODUCTION

The need for ecosystem restoration, dam removal, and sediment management has been addressed in previous environmental impact statements, including the 1996 *Final Elwha River Ecosystem Restoration Implementation Environmental Impact Statement* (1996 FEIS). In addition to analyzing two alternatives for dam removal and sediment management, the 1996 FEIS proposed mitigation for impacts of dam removal related to water supply, water quality, flooding, changes in groundwater levels, and impacts to fish. Subsequent to the release of the 1996 FEIS, several unforeseen changes occurred and additional environmental information has emerged. These developments resulted in the need for different mitigation than that analyzed in the 1996 FEIS. This change in circumstances was addressed through the preparation of the *Elwha River Ecosystem Restoration Implementation / Final Supplemental Environmental Impact Statement*, which supplements the 1996 FEIS.

The Department of the Interior, National Park Service, has prepared this Record of Decision (ROD) on the *Elwha River Ecosystem Restoration Implementation / Final Supplemental Environmental Impact Statement* (Final SEIS) for Olympic National Park, Washington. This ROD includes a statement of the decision made, synopses of other alternatives considered, the basis for the decision, a description of the "environmentally preferred" alternative, a discussion of impairment of park resources or values, a listing of measures to minimize environmental harm, and an overview of public engagement and agency coordination in the environmental decision-making process.

DECISION (SELECTED ACTION)

The National Park Service (NPS) will implement the preferred alternative as described in the Final SEIS issued in July 2005. Under the selected action, the NPS will provide adequate and reasonable mitigation for impacts of removing the Elwha and Glines Canyon dams for downstream users. These mitigation measures will provide flood, water quality and water supply protection equivalent to what

users present before passage of the Elwha Act receive now. Where the Final SEIS analyzed several options for providing this protection to users, the selected action in nearly every case is comprised of implementing the option that is environmentally preferred. Key elements of the selected alternative include the following:

- The use of surface water rather than a subsurface infiltration gallery and additional Ranney well to supply the city's municipal and industrial customers, the Lower Elwha Klallam Tribe's fish hatchery and the state chinook rearing channel. This change is intended to prevent "blinding", which research after 1996 found was likely to occur in any kind of subsurface water collecting facility. Blinding clogs and effectively seals the surface with fine sediment for a period of time, and can substantially reduce water yield.
- Removal of the existing rock dam and intake structure that currently supplies the city's industrial customers and replacement with a graded fish riffle and weir structure to pass fish ("Elwha Water Surface Intake") and pool water. The existing intake will be replaced.
- A sediment removal facility ("Elwha Water Treatment Facility") built in the location of the existing industrial treatment channel on the east bank of the river, which will receive water for treatment from the weir and intake noted above. Water from this facility will be sent to industrial customers, and at times to a new water treatment facility during the 3-5 year dam removal impact period.
- A new permanent water treatment facility in Port Angeles ("Port Angeles Water Treatment Facility") adjacent to the city's existing landfill area, which will receive water from the sediment removal facility during and for a period of time following dam removal, and subsequently from the city's existing Ranney collector.
- Flood protection of the Dry Creek Water Association's existing wellfield.
- Connection of the Elwha Heights Water Association (EHWA) to the Dry Creek Water Association water delivery system to maintain water quality to Elwha Heights residents.
- Relocation of the tribal hatchery to the tribally-owned Halberg tract, with water supplied from the Elwha Water Treatment Plant during the sediment release impact period associated with dam removal and with untreated surface water following the impact period.
- Keeping the state chinook rearing channel open during dam removal with water from the Elwha Water Treatment Plant during the sediment release impact period and creating a rearing pond on nearby Morse Creek as an additional rearing location for use during dam removal.
- Raising the federal levee an average of 3.3 feet and armoring with rock riprap where needed. The federal levee would be extended approximately 450 feet north and 1,650 feet south to provide additional protection from potential flooding following dam removal (the

southern extension would cross the Halberg property). This route would include the use (raising and strengthening) of an existing levee haul road. A second levee across the river near its mouth would also be raised to protect private homeowners there.

- A series of small-scale flood protection measures, such as raising wellheads, dikes, roads or property to protect private citizens and existing facilities (Ranney collector, state WDFW fish-rearing facility, etc.) would be built. Most are similar or identical to those already analyzed in the 1996 FEIS (see Table 1 below for details).
- Constructing an on-reservation wastewater collection and treatment system, including pumps and pipelines, to protect residents on the reservation.
- Sections removed from Glines Dam would be transported to a private facility to be crushed and recycled if economics indicate this would be advantageous. If not, concrete would be disposed of in open pit mines and other locations evaluated in the 1996 FEIS.
- A 0.4-mile graveled trail, overlook and chemical toilet available to all (including disabled) visitors would be built to observe the removal of Elwha Dam and offer future interpretive opportunities. Access to the trail would begin in an existing parking area on the west side of Highway 112.
- Property and/or conservation easements would be purchased to offset impacts of dam removal to trumpeter swans.

OTHER ALTERNATIVES CONSIDERED

The Final SEIS describes several water and flooding mitigation options that were considered but dismissed. These alternatives were either not reasonable for economic, logistic or environmental reasons, or offered no advantages and would have the same or similar environmental impacts as those analyzed. These included subsurface water supplies or alternative surface supplies of water; different locations for a surface water intake from the Elwha River; water treatment options including storage of clean water and other chemical treatment processes than the one selected (Actiflo); and combining the tribal hatchery with that owned and operated by the Washington Department of Fish and Wildlife. The Final SEIS included detailed analysis of the following alternatives:

- For Dry Creek Water Association (DCWA) homeowners, three options and five pipeline routes were examined. These include floodproofing the existing wellfield, connecting to the city of Port Angeles municipal system and floodproofing an alternate wellfield. Five routes to connect the alternate wellfield to DCWA homeowners were examined.

- For Elwha Heights homeowners, currently supplied by a small pipeline leading from the city's Ranney well (which will be ineffective during high sediment periods), three alternatives were analyzed. The options include a connection to the proposed new Port Angeles water treatment facility, a link to the nearby Dry Creek Water Association, and a treatment package that fits in the existing line from the Ranney well.
- An option of expanding the tribal hatchery at its existing location was examined, in addition to the selected choice of relocating it.
- In addition to the selected route for the federal levee extension to the south, four additional options were analyzed. A 1,600 foot extension positioned along the floodplain terrace, and a series of spur dikes and deflection structures were analyzed in the draft SEIS. A longer extension (3,500 feet) along the terrace and a fourth route (2,500 feet) which follows the floodplain and then turns southeast at the end of the Halberg property were added to the Final SEIS.
- Alternatives to provide existing levels of flood protection for private homeowners on the west side of the river near its mouth included raising and armoring the levee, realigning it along higher ground, or removing it and raising each of the affected homes.
- Alternatives to provide existing levels of sewage treatment to tribal members and tribal facilities (rising groundwater will make septic systems ineffective) included pumping wastewater through one of two pipeline routes to the city of Port Angeles sewage treatment plant. A second alternative of community wastewater treatment using bio-membrane technology and a constructed wetland to further treat effluent was analyzed in the Final SEIS.
- Concrete from the Glines Canyon Dam was assumed to be disposed of in a series of open pit mines and solid waste disposal facilities analyzed in the 1996 FEIS. The Final SEIS added an option of trucking blocks to concrete crushing facilities for recycling.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

In reference to the Council on Environmental Quality regulations guiding the determination of the "environmentally preferred" alternative, such an alternative is defined as that which will promote the national environmental policy as expressed in §101 of the National Environmental Policy Act. This section states that "... *it is the continuing responsibility of the Federal Government to:*

(1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;

(2) assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;

(3) attain the widest range of beneficial uses of the environment without degradation, risk to heath or safety, or other undesirable and unintended consequences;
(4) preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;
(5) achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and
(6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources."

Expressed more succinctly, the "environmentally preferred" alternative is the course of action that results in the least damage to the physical and biological environment, or conversely is the alternative which best protects historic, cultural and natural resources. Where the Final SEIS evaluated more than one option, the following were deemed to be the "environmentally preferred" actions:

- Protecting the existing wellfield for Dry Creek Water Association will remove the need to drill new wells or install pipelines. The pipelines would have had adverse impacts on vegetation, including floodplain wetlands, and drilling an alternate wellfield would have moderate, permanent impacts to riparian vegetation. Because floodproofing the existing wellfield would have only minor impacts to riparian vegetation and no impacts from pipelines, it is environmentally preferred.
- A package treatment plant installed in the existing pipeline connecting Elwha Heights subdivision to the city's Ranney well would involve only negligible and temporary impacts to soils and vegetation to install the kit and occasionally removed used filters. The other alternatives analyzed would require the installation of 6,800 feet of pipeline (connection to the proposed Port Angeles Water Treatment Plant) or 4,000 feet of pipeline (link to Dry Creek Water Association) and so would result in greater disturbance to vegetation, including a few small wetlands in the latter case. However, Elwha Heights residents would not accept a package treatment plant and preferred connection to the Dry Creek Water Association (DCWA) water delivery system. Therefore, connection to the DCWA system is the selected option, although not environmentally preferred.
- In the case of the tribal hatchery, expansion at its existing site would mean fewer impacts to soils, vegetation or wildlife than relocating it to the Halberg property. However, the impacts of relocating the hatchery would generally be minor, in part because the Halberg property is already disturbed and partly because construction equipment will be used to

reinforce and extend the federal levee across the Halberg property. This construction would affect wildlife in the area for at least the period heavy equipment is in operation and would result in the temporary removal of vegetation and permanent loss of some floodplain value for vegetation and wildlife. The combined impact of the hatchery and levee construction would not be noticeably greater than the levee alone. In addition, expanding the hatchery in its existing location would be difficult because of increasing flooding and sediment deposition. These operational difficulties mean the hatchery would not be optimally available for critical fish restoration efforts following dam removal, a key purpose of the project. Therefore, although relocating the hatchery would result in greater ground disturbance and impacts to some resources, its key role in restoring the Elwha River anadromous fisheries mean beneficial impacts to this resource. Relocation is environmentally preferred.

- The shortest extension southward of the federal levee that would provide adequate protection of tribal and private property from increased flood stage expected following dam removal is both the environmentally preferred and preferred option. This 1,650-foot extension and would begin at the existing federal levee's southern terminus and proceed south and southeast across the Halberg property to make use of an existing haul road. A series of stand-alone spurs and dikes, as well as a 1,600-foot free-standing levee to the south of the terminus of the existing levee analyzed in the draft SEIS were found during the public review period of the draft to be potentially inadequate to contain flood flows. They were replaced with two options that begin at the southern end of the existing levee and travel south/southeast. Of these three choices (haul road alignment and the two new extensions) considered feasible, the original 1,650-foot extension south and use of the existing haul road to provide flood protection results in the least ground disturbance or impact to floodplain values and so is environmentally preferred.
- The NPS will raise an existing levee to protect users on the west side of the river near its mouth. Although this alternative would result in minor and temporary impacts related to strengthening the levee, it is not environmentally preferred among those analyzed. The Final SEIS evaluated two other alternatives that would have reconnected the river to a tidal wetland that lies west of the levee. However, the NPS selected the option of raising the existing levee for cost reasons.

- The environmentally preferred option for providing wastewater treatment for tribal members and facilities is to connect them via pipeline to the Port Angeles wastewater treatment facility. Either pipeline route analyzed would follow road or railbed corridors which are already highly disturbed. This option would result in less ground disturbance, and resulting impacts to soils,

wildlife and vegetation, than construction of a community wastewater treatment plant, the other alternative evaluated. However, the city of Port Angeles has not approved connection to the city system so the NPS has selected the on-reservation community wastewater treatment plant as the preferred option.

- Crushing and recycling concrete removed from the Glines Canyon Dam is environmentally preferred to disposing in solid waste facilities because it re-uses a product that would otherwise require mining, energy consumption, water and other resources to produce.

BASIS FOR DECISION

In reaching its decision to select the preferred alternative, the NPS considered the Organic Act, Elwha Act, Olympic enabling legislation and the NPS' 2001 *Management Policies*, as well as environmental, economic and technical advantages an alternative might offer. The NPS also carefully considered public comments received during the conservation planning process.

The rationale for choosing to remove the dams and manage sediment via river erosion is laid out in the record of decision for the 1996 FEIS. The Final SEIS supplements the 1996 FEIS and focuses on water quality, water supply, and flooding mitigation. The rationale for identifying and analyzing mitigation measures different from those previously analyzed in the 1996 FEIS is explained in chapters 1 (Purpose and Need) and 2 (Alternatives) of the Final SEIS and summarized here.

Subsequent to the release of the 1996 FEIS, testing indicated that periods of high turbidity may lead to blinding of the river's subsurface and corresponding lower flows to the infiltration galleries that would collect water for industrial water users, the tribal hatchery, and Port Angeles municipal customers. Because the Elwha Act requires that municipal and industrial water users be protected from the potential adverse impacts of dam removal, the potential for sediment blinding made infiltration galleries unacceptable. The operation of the tribal hatchery is considered critical to protect anadromous fish stocks during dam removal and to restore them following removal. For these reasons, a surface water supply, including a fish weir to help pool the water and a new intake system, was added to the project. After sediment is removed by the proposed Elwha Water Treatment Plant (similar to, but larger than the sediment removal facility proposed in the 1996 FEIS), the treated surface water would supply the tribal hatchery, a new water treatment plant in Port Angeles, the NPI mill via an existing industrial treatment facility on NPI property and the Washington Department of Fish and Wildlife chinook rearing facility. The rearing facility is now required to remain open during dam removal (the 1996 FEIS would have resulted in its closure)

because chinook have been federally listed as threatened. Therefore, in consultation with NOAA Fisheries, park, tribal and state fisheries managers have agreed to additional measures to protect this stock during dam removal. Keeping the state hatchery open with a treated water source is one of these measures. Establishing rearing ponds in nearby Morse Creek to protect and produce chinook for restoration is another.

The choice to treat municipal water using a new full treatment facility in Port Angeles instead of the second Ranney collector proposed in the 1996 FEIS is based on factors outside those listed above. Although blinding would also affect both the existing and proposed new Ranney collector, the city's supply from the Ranney well was recently deemed "under the influence of surface water" and additional treatment required as a result. To provide both this required additional treatment independent of the dam removal proposal and to meet the requirements of the Elwha Act to provide existing levels of water quality following dam removal, a traditional coagulation/filtration plant using the Actiflo process was proposed and is selected.

In addition to water supply, flood protection is also a basis for selecting the preferred alternative. The riverbed will aggrade following dam removal potentially resulting in increased flooding and geomorphic changes such as additional meandering and creation of side channels to redirect high velocity flows. To provide the current degree of protection, the 7,100 foot federal levee must be lengthened in both the northerly and southerly direction with a greater extension to the south. Additional information indicates reactivation of side channels and associated flooding risk is greater than originally analyzed in the 1996 FEIS and so levee extension routes and strengthening options were included in the Final SEIS. The NPS elected to extend the levee southward using an existing levee haul road for part of the way to minimize ground disturbance and impacts to soils, vegetation, wildlife, and floodplain values. Protection of other structures and homes from increased flood risk is provided by a variety of means. The decisions on which means to use are based on homeowner preference, cost, technical and logistical constraints and environmental factors. If possible, existing structures would be raised or strengthened rather than new structures built. This includes the homeowners and other connections required by Dry Creek Water Association (DCWA), whose wells would be subject to more frequent flooding. The NPS will floodproof the existing DCWA wellfield because it is environmentally superior and less expensive than other options analyzed. Table 1 shows the mitigation selected by the NPS for affected structures except those described above (e.g. the Lower Elwha Klallam Tribe, which would be protected by lengthening the federal levee, and the DCWA wellfield).

Groundwater levels are also expected to change following dam removal rendering some lower lying septic systems on the Klallam Reservation ineffective. Because growth has occurred since the 1996 FEIS and will continue to occur on the reservation, the tribe is going to combine wastewater and treat it together rather than rely on individual septic systems. The Tribe and NPS have selected the alternative of an on-reservation community wastewater collection and treatment system because the city of Port Angeles has not approved connecting the tribe to the city's wastewater system.

Several conditions adopted by the NPS to better protect and restore chinook salmon and bull trout were analyzed in the Final SEIS and will be implemented. These include keeping the WDFW rearing channel open with a treated water during and following dam removal, creating and using ponds established in Morse Creek for holding and rearing chinook, moving the tribal hatchery to a location on the Halberg property at the southern end of the reservation to maximize its use in the Elwha restoration (of many stocks of anadromous fish), and a series of smaller measures (collecting and planting above Lake Mills, modifying culverts to provide additional habitat during dam removal, etc.) to protect bull trout. These fish protection and restoration measures were added to better meet the purpose of overall action as directed by Congress in the Elwha Act, to maximize the success of restoring the Elwha River ecosystem and its native anadromous fisheries. Some will also better protect species that have been listed as threatened on the federal endangered species list since the 1996 FEIS was completed.

The choice to crush and recycle concrete is one that is made for environmental reasons as noted above. If it is cost effective, the NPS will send blocks removed from Glines Canyon Dam to concrete crushing facilities for recycling.

The NPS will build an interpretive, ADA accessible trail from an existing parking lot to a spot where visitors can watch the deconstruction of Elwha Dam. The trail will add to the park visitor experience, and will be designed to avoid impact to unique vegetation and minimize erosion. It will also somewhat offset impacts to visitors related to closures during dam removal.

FINDINGS ON IMPAIRMENT OF PARK RESOURCES AND VALUES

The NPS may not allow the impairment of park resources and values unless a contemplated use or activity is directly and specifically provided for by legislation or proclamation establishing the park. Impairment that is prohibited by the NPS Organic Act and the General Authorities Act is an impact

*Table 1. Mitigation for Structures Subject to Flooding**

Location and Structure	River Mile	Mitigation
Locally constructed, privately owned levee (west bank)	0.0-0.1	Raise and armor the levee (preferred alternative); realign it alon higher ground; or remove it and raise affected homes.
EPHA wells and private residence	1.4	Mitigation completed.
City of Port Angeles Ranney well collector	2.8	Protect with levee.
Port Angeles industrial water supply channel	2.5–3.1	Raise 4,850′ of the Crown Z Road by 4.5′ (immediately west o facility) and add flap gate to entrance channel culvert; raise wellheads at least 2.5′ to 2.8′; or possibly construct a single levee to protect gate and wellheads.
WDFW fish-rearing facility	2.8–3.0	Raise the Crown Z Road as above.
Elwha water treatment plant	2.8	Raise the Crown Z Road as above.
West bank residences	3.5	Ring dike; move on site, and elevate until first floor is 4.5′ higher.
East bank residence	3.5	Move on site and elevate until first floor is 4.5′ higher.
DCWA well field and access road	3.7	If existing site maintained on the east side, raise ground level, road grade, one well house, and two wellheads. If alternative si developed on the west side, raise well field area.
East bank private well	7.9	Raise wellhead.
East bank residences	8.4	Move offsite (temporary structure); elevate in place and use a ring dike; or move to higher ground on site.
River training dike	8.5	Raise dike 1.5′ and armor with riprap (not in USACE 2003 report).
East bank residence	9.5	Raise or floodproof residence; armor channel bank with riprap 15′ high and 3′ thick.
Elwha campground	11.0	Take no active flood protection measures because use is seaso and outside flood periods; flood warnings are provided and the Elwha subdistrict is closed during floods; and the campground h minimal development.
Elwha Ranger Station (including structures, septic system, roads, and utilities)	12.0	Monitor/evaluate bank erosion threat and take corrective action (e.g., bank stabilization, engineered logjams) as needed.
Altaire campground	12.5	Take no active flood protection measures because visitor use is seasonal and outside flood periods (campground closed from lat summer / early fall to late spring / early summer); flood warning are provided and the Elwha subdistrict is closed during floods; t campground has minimal development.
Elwha Valley (Olympic Hot Springs) Road – 4 miles long		Raise about 1 mile of low-elevation sections of the road in the park and 0.33 mile of road outside of park by 1′. Riprap select sections of road. (USACE 2003 report recommends monitoring to assess when or if a road segment needs to be raised.)
Bridges:		
U.S. Highway 101	7.7	Add debris deflectors to the in-water piers.
Elwha Valley Road	12.1	

* Extension of federal levee and floodproofing of DCWA wellfield treated separately and not shown here

that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. In determining whether impairment would occur, park managers examine the duration, severity and magnitude of the impact; the resources and values affected; and direct, indirect, and cumulative effects of the action.

According to NPS policy, *"An impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is: a) Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; b) Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or c) Identified as a goal in the park's general management plan or other relevant NPS planning documents."*

This policy does not prohibit all impacts to park resources and values. Managers have the discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impacts do not constitute an impairment. Moreover, an impact is less likely to constitute impairment if it is an unavoidable result, which cannot be further mitigated, of an action necessary to preserve or restore the integrity of park resources or values.

After analyzing the environmental impacts described in the Final SEIS, as well as considering public comments and agency consults, the NPS has determined that implementation of the selected alternative will not constitute or lead to impairment to Olympic National Park's resources and values. The actions in the selected alternative are intended to protect water quality, water supply and to offer existing levels of flood protection, and the NPS has chosen the environmentally preferred means of doing so in nearly every case. Only when the environmentally preferred option is cost prohibitive (such as in raising all homes on the west side of the river mouth rather than strengthening an existing levee) or cannot otherwise be implemented (such as lack of agreement with the city of Port Angeles to accept wastewater from the tribe) is another alternative chosen.

MEASURES TO MINIMIZE ENVIRONMENTAL HARM

In addition to selecting options with the least ground disturbance or minimal environmental impact for most of the water and flooding mitigation facilities analyzed in the Final SEIS, the NPS has also investigated all practical measures to avoid or minimize environmental impacts that could result from the selected alternative. These measures have been identified and incorporated into the selected alternative (and are detailed in the Alternatives chapter and Appendix A in the Final SEIS). Measures to minimize environmental harm include, but are not limited to: applying temporal and spatial

restrictions on construction and maintenance activities, siting projects and facilities in previously disturbed or developed locations; making maximum use of existing flood protection or other structures to minimize new development; restoring habitats using native plant materials; implementing best management practices for minimizing erosion and sedimentation during construction; conducting surveys of special status species and their habitats and archaeological resources; implementing measures to protect listed fish species during dam removal; avoiding wetlands or wet areas (including the Elwha River) through rerouting and setbacks; monitoring construction activities; and maintaining consultations with the Washington Historic Preservation Office, National Marine Fisheries Service, NOAA Fisheries, and U.S. Fish and Wildlife Service as appropriate.

PUBLIC AND AGENCY INVOLVEMENT

Extensive public engagement has been ongoing since the Federal Energy Regulatory Commission began its hydropower licensing process in 1986 and includes: two commission scoping meetings, a scoping document for the original programmatic environmental impact statement, a draft Elwha Report (later submitted to Congress), public meetings and workshops regarding the Elwha Report and the programmatic draft environmental impact statement. The draft implementation FEIS received such minimal comments that it allowed preparation of an "abbreviated" final EIS (the 1996 FEIS which served to correct minor errors and provide for editorial clarifications).

During fall 2002 only nine comment letters were received during scoping for the SEIS; all issues raised were duly considered and aided in preparing the draft SEIS. The draft SEIS was released for public review in November 2004. Newspaper articles and radio announcements appeared in local and regional media. Notices were sent to the mailing list which includes the Congressional delegation, federal, state, and local agencies and Indian Tribes, interested individuals, and all respondents that provided scoping comments. Overall approximately 80 copies of the document were distributed; copies were also made available at public libraries.

The draft SEIS public comment period extended through March 15, 2005. The park received nine letters; respondents included the Washington Department of Ecology, Washington Department of Natural Resources, the Lower Elwha Klallam Tribe, the city of Port Angeles, Dry Creek Water Association, Inc., American Whitewater, Trout Unlimited, and Russ Busch, Tribal Attorney. The US Environmental Protection Agency published a LO evaluation (lack of objections) in the *Federal Register* on April 8, 2005.

The state agencies primarily commented on the various permits which would be necessary to begin dam removal. Three individuals from the tribe submitted requests for changed language reflecting updates since the draft SEIS was released. Because the tribe and city of Port Angeles have been unable to reach a final agreement on the acceptance of tribal wastewater to the city's treatment facility, a second alternative was added. This alternative would be located on tribal land and would use a membrane bio-reactor technology and constructed wetland to treat wastewater and minimize impact of any effluent. Effluent would be allowed to infiltrate into soil underlying the wetland, or would be released into the Elwha River. The preferred alternative remains as it was in the draft SEIS, that is, to complete a hook-up to the city of Port Angeles' wastewater treatment facility. The tribe has also evaluated two different alignments for extending the federal levee to the south that would better mitigate impacts from flooding at this end of the reservation. These have been added to the text of the Final SEIS, although the preferred alternative is one that was analyzed in the draft SEIS. Additional information on fisheries and vegetation was suggested by the third tribal individual (this did not affect selection of the preferred alternative, but did add to the completeness of the Final SEIS). The city of Port Angeles' comments were wide ranging, and included: additional clarification on measures to mitigate impacts (to industrial users, for example); permitting and final clearances that would be required from the city; need for additional impact information, such as to Orca whales, socioeconomics and to current traffic conditions. While clarification of some impacts and mitigations was added to the document, no changes to the preferred alternative were necessitated by the city's comments. Mr. Busch asked for additional information to be added to the description and impacts of the No Action alternative, as well as to the impacts of the Preferred Alternative. Some information was added, but it did not affect the selection of the preferred alternative or alter it in any way. American Whitewater asked that the safety of the new surface diversion facility (the ESWI) be evaluated so that access for recreational uses would be maintained along the entire river, and Trout Unlimited indicated support for several of the features of the preferred alternative. The diversion would be able to pass kayaks and other craft safely, and signs to indicate any hazard areas would be used to direct recreational users.

Extensive consultation and coordination was conducted with federal and state agencies and tribes. NOAA Fisheries, U.S. Fish and Wildlife Service, Army Corps of Engineers and the Lower Elwha Klallam Tribe reviewed drafts of the SEIS, developed technical information and provided comments. The Washington Departments of Fish and Wildlife, Ecology, and Health were briefed on the contents and findings of the SEIS during numerous technical meetings where design criteria and products were discussed. The Final SEIS reflects the input of these agencies.

The park's notice of availability for the Final SEIS was published in the July 21, 2005 *Federal Register*, and release of the document was widely announced via local and regional press media and direct mailings. Approximately 60 copies of the document were distributed. The 30-day "no action" period was formally initiated upon the US Environmental Protection Agency's notice of filing of the Final SEIS in the September 2, 2005 *Federal Register*. Two comment letters were received during this time. Ms. Eloise Kailin, Secretary of Protect the Peninsula's Future (PPF) commented that alternatives to Actiflo should not have been dismissed, plans should be included that do not involve the use of alum, and that the city of Port Angeles' proposal to add fluoridation to its drinking water "be subjected to a NEPA EIS process. Mr. Gerald Steel, attorney representing PPF and Clallam County Citizens for Safe Drinking Water, commented that "it would be considered piecemealing of environmental review to not analyze permanent fluoridation of the City in your environmental analysis of the new water treatment plant." The NPS has reviewed and considered these comments and does not find a factual basis for altering the Final SEIS so it remains unchanged.

CONCLUSION

Among the alternatives considered, the selected alternative (preferred alternative identified and analyzed in the draft and Final SEIS) best meets the requirements of the Elwha Act to provide existing pre-dam-removal levels of water quality, water supply and flood protection. The selected alternative will protect or enhance park natural, cultural, and environmental resources, and will provide for a visitor experience not currently available in the park. The selected alternative fulfills requirements of the federal Endangered Species Act and comports with national environmental policy goals. The selected alternative will not result in the impairment of park resources and values. Implementation of the selected alternative may occur as soon as practicable. The official responsible for implementing the selected alternative is the Superintendent, Olympic National Park.

Date: 10-21-2005

Approved: Jonathan B. Jarvis

Jonathan B. Jarvis
Regional Director, Pacific West Region