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6 September 2022

Re: Tenas Creek Restoration Project

Comments submitted electronically to <http://fs.usda.gov/project/?project=62572>

Pilchuck Audubon Society represents over 1,000 members in the north Puget Sound region of Washington State. Our mission is to conserve and restore natural ecosystems focusing on birds and other wildlife for the benefit of the earth's biological diversity. We have been engaged with planning and projects on the Suiattle River Road 26 for over thirty years. This letter constitutes our scoping comments regarding the Tenas Creek Restoration Project.

We fully support the goal of improving water quality and fish habitat in Tenas Creek.

We prefer the option of replacing the bridge in the current location with a longer and more hydrologically appropriate bridge. Rerouting the road would be more costly financially as well as ecologically. The environmental costs would include:

1. Loss of soil and soil organisms including mycorrhizal fungi.
2. Water quality impacts through sedimentation and runoff of pollutants during construction, with ongoing adverse effects from the existence of a new road.
3. Amplified landslide risk where road construction crosses steep slopes, aggravating numbers 1 and 2 above.
4. Increased stream temperatures and bank destabilization from loss of riparian vegetation.
5. The relocation option would have greater carbon emissions, air pollution, and fossil fuel consumption by construction equipment because of the increased scope of the project.
6. Loss of forest habitat, particularly important if any mature forest is removed for the new road & bridge construction (it appears that the impacted forest is primarily if not exclusively recently clearcut, but this is not confirmed by the scoping letter).

The vague comment in the scoping letter about "potential for augmenting habitat with large wood" concerns us. We suspect that this is either a reference to placing cut trees on the ground and/or in the streambed; or logging with the goal of causing the remaining trees to grow faster. Letting trees live out their natural lives and fall in their own time is far preferable to cutting them down to place them somewhere; and allowing natural competition to favor the best-adapted trees to survive leads to a healthier forest than logging can.

It appears that either bridge location would be within the Suiattle portion of the Skagit Wild and Scenic River corridor, so the environmental analysis must consider effects on this land use designation.

Regardless of the alternative chosen, we urge the agencies to minimize the road clearing width as much as possible, particularly through the riparian corridor; and to preserve all large trees and snags present.

We realize that one perceived advantage of relocating the bridge might be the ability to avoid the interruption of recreation travel on a popular travel route during peak hiking season. We hope that you will not let this influence your decision over ecological concerns, which should be the priority for this project.

Thank you for providing us the opportunity to comment on this project.

Sincerely,

William Derry, President