

Data Submitted (UTC 11): 5/11/2022 5:24:01 PM

First name: Jim

Last name: Doyle

Organization:

Title:

Comments: My comments to this NF Stillaguamish Landscape Vegetation Management Project proposal are based on my 25 years (1980-2005) experience and knowledge as a MBSNF senior aquatic ecosystem staff member (fish biologist). I led the aquatic staff in the planning and development of the aquatic sections of the 1990 Land & Resource Plan to include the lead role in the development of the Hydrologic Cumulative Effects Assessment. In 1993-1994 I participated as a requested participant in the FEMAT development of the NWFP. Took lead role on the aquatic staff in implementing the NWFP's ACS components. Served as Forest's watershed restoration coordinator (1995-2005). Lead role in planning, developing, and implementation of multi-year programmatic BA/BO's with NMFS and USF&WS for ESA-Section 7 Consultation and ESH Consultation. Familiar with NF Stillaguamish River Basins 5th field watersheds especially Deer Creek. Spent more field time in Deer Creek than any other watershed on the MBSNF from 1980-2005). Participated in many fish utilization and habitat surveys, hydrologic and soil sensitivity assessments, timber sale layout delineation, and monitoring of timber sale activities in the 1980's (pre-sale, harvesting, post harvesting) and many watershed restoration monitoring efforts (implementation, effectiveness, and validation).

Comment #1

The NF Stillaguamish to include Deer Creek are Tier 1 Watersheds. This land allocation overlays all other land allocations as described in the NWFP's 1994 ROD. Tier 1 Watersheds are a one of four components of the NWFP's Aquatic Conservation Strategy. Tier 1 Watersheds were designated because they provided refugia. Refugia are the cornerstones in species conservation strategies. They were designated to provide habitat for anadromous and resident fish stocks at risk. The N.F. Stillaguamish including Deer Creek are watersheds having multiple wild fish populations at risk. Key Watersheds have these stated ACS objectives (a) no new roads, (b) reduce existing and non-system road mileage outside roadless areas, (c) if funding is insufficient to implement restoration, there would be no net increase in the amount of roads, (d) highest priority for restoration, (€) watershed analysis required prior to management activities. This scoping document needs to include this land allocation designation.

Comment #2

The NF Stillaguamish Vegetation Landscape Project Scoping Letter doesn't clearly identify the need to update/revised Watershed Analysis documents. The posted Deer Creek Analysis and NF Stillaguamish River Watershed Analyses (done in 1985 and 2000) don't cover this vegetation proposal. These watershed analyses are 20-25 years old, a time period that has resulted in changing landscape conditions due to natural events (storms/floods, insect infestations) and climate changes.

As stated in the NWFP's -ACS. Watershed Analysis is required for new ground disturbing proposals in Tier 1 Key Watersheds and in Riparian Reserves, as well as for any proposed Watershed Restoration (terrestrial and aquatic). Any new road and vegetative manipulations in Tier 1 Key Watersheds and Riparian Reserves requires Watershed Analysis. No new or updated Watershed Analysis has been identified clearly in the Scoping Notice.

The analysis is to be conducted by an interdisciplinary team consisting of geomorphologists, hydrologists, soil scientists, biologists and other specialists as needed. Information used in this analysis includes: maps of topography, stream networks, soils, vegetation, and geology; sequential aerial photographs; field inventories and surveys including landslide, channel, aquatic habitat, and riparian condition inventories; census data on species presence and abundance; water quality data; disturbance and land use history; and other historical data (e.g., streamflow records, old channel surveys (ROD Appendix B- Basics for Standards & guidelines; page B-21). Watershed Analysis were not to be static documents, as new information/data or new projects were being proposed, revised and updated analysis were to be completed as stated in the Federal Guide for Watershed Analysis, Revised, August 1995. Watershed Analysis was designed to support and contribute to decision making documents such as EA's and EIS's. NEPA documents and NWFP-ACS Watershed Analysis are two separate management procedures and products.

Comment #3

Deer Creek has been a 5th field watershed with an extensive history of watershed restoration. The attached document summarizes this effort. This proposed landscape project should include the Forest's watershed restoration history as supporting documentation.

Comment #4

The Forest's road systems in the NF Stillaguamish and in particular Deer Creek and Finney Creek (Roads Systems 17, 18, 28) have been damaged by past storm /flood events. Back during 1995-1996, I worked with the Engineering to put all the FWA-ERFO-funded road repair work done on the Forest into an Access database. We took info from paper copy DSR-field forms that were stored in the S.O. The info collected was road number, location by mile post, damage done, repair recommended and costs. These DSR forms go back to 1974. The database currently has 935 records covering 15 flood years (1974-2003). This dataset shows Rd 17 system (17, 1705, 1706, 1708, 1720, 1722, 1735, 1730, 1731, 1735, 1750) in Deer Creek experiencing damage sites from 8 flood events (1974-2003); and Rd 18 road system (18, 1810, 1820, 1830, 1840, 1855) experiencing road damage sites from 7 flood events (1979- 2003). Most of these sites had plugged culverts that resulted in road fill-slope failure with the bulk of the materials being deposited into perennial fish and non-fish bearing channels. In my opinion, I think it should be disclosed what other road systems in the NF Stillaguamish Vegetative project Area were assessed for flood damage and what was found from the storm/flood events in mid -November 2021. It would also be appropriate to know what other Forest road systems in the NF Stillaguamish River experienced ERFO-funded flood repair work after the 2003 floods and up to the November 2021 floods.

Comment #5

Because the Forest is using this planning known as Condition-Based- Management, the specific locations for timber harvesting and temporary road construction in the riparian reserves is currently not known. Locations will be determined upon project implementation. I really don't understand how the Forest will conduct/complete ESA- Section 7 consultation (with both NMFS and US F&WS) and NMFS Essential Fish Habitat on this project without project site specifically. Formal consultation will be required because these projects will be called Likely to Adversely Affect (LAA).

Comment #6

Given the amount of aquatic ecosystem work that is going to be required to implement this vegetative manipulation project (field work in the selected project area to delineate timber sale area boundaries, employment of one or more of the 44 soil, water, fisheries BMP's/ mitigation measures), and implementation and effectiveness monitoring field reviews, plus the ESA & EFH Consultation needs I have concerns that this workload can be met by the current Forest Aquatic Staff.

Comment #7

And given that this proposal could have a timeline up to 15 years for implementation/completion, how will the information/and data be stored and made accessible? Over this time period, staffs will change due to retirement, transfers, reassignments and fluctuating budgets. How will these projects be tracked and documented over such a time period?

James E. Doyle -May 11, 2022