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Comments: These comments are based on the public zoom meeting the Mt. Baker Snoqualmie National Forest on the proposed N.F. Stillaguamish Landscape Vegetation Project - May 18, 2022

I was disappointed with the planning and aquatic resources information shared in that Zoom meeting. Major omission was not discussing the NWFP's designation of Tier 1 Key Watershed for both the NF Stillaguamish River and Deer Creek. The whole concept of the ACS was modelled by the Forest Ecosystem Assessment Team (FEMAT) based on watershed characteristics like Augusta Creek (profiled in the ROD Stds and Guidelines) and Deer Creek. The NF Stillaguamish River was selected as a Tier 1 Key Watershed because it contained multiple salmon and trout species at risk (depressed, critical), three species eventually getting federally listed as threatened (chinook salmon, steelhead trout, and bull trout). I know this because I was involved with the FEMAT Aquatic Members (Jim Sedell and Gordon Reeves) in identifying and delineating the 11 Key Watersheds (10 Tier 1 and 1 Tier 2) on the MBSNF.

Deer Creek was a watershed having the other three components of the Aquatic Conservation Strategy (ACS). It had a documented history of timber harvesting and road building (landslides and storm/flood damaged road failures) in sensitive and unstable soils containing dense networks of perennial and intermittent channels (riparian reserves), most of this documented in the previous Forest Plan of 1990 in the forest-wide hydrologic cumulative effects assessment (akin to a watershed analysis). And by 1994, 8-10 years of watershed restoration (passive and active) had been done in Deer Cr by the MBSNF and was still ongoing beyond 1994.

In the Zoom meeting, it was not explained the rationale (metrics, species and need based on what field info) for aquatic passage work. Also scoping letter mentions tree tipping potential for restoration potential (based on what metrics and field data).

Scoping letter and the Zoom call presentation displayed this vegetation proposal to be a predominantly terrestrial (wildlife) restoration. Based on the ROD Stds & Guidelines, a watershed analysis is required (a) for any type of restoration (wildlife or aquatic), (b) timber harvesting thinning or any stand improvement), and (c) any road work (temporary new road construction, existing road upgrades, and road decommissioning) in Tier 1 Key Watersheds and Riparian Reserves. Don't see any mention of the need for a Watershed Analysis in the Zoom meeting nor the scoping document.

Transportation Planning - zoom meeting covered only existing/potential road gate locations. No discussion about possible locations of road work (temporary road construction, existing road upgrades, storm proofing). To aquatics this is critical information especially in Riparian Reserves.

The silviculture program has two objectives in this project (a) improve forest stand complexity in LSR's and matrix designated areas and the Finney AMA (this was in the scoping document and presented at the zoom meeting) but (b) it's not fully disclosed that the other objective is to sell harvested timber. The timber company rep at the zoom meeting asked a question about this (estimated volume offered) but the ranger wouldn't comment on it, she said that would be determine later in the planning process. This objective needs to be fully disclosed in future documents.