

Data Submitted (UTC 11): 6/3/2022 11:55:31 PM

First name: Jim

Last name: Doyle

Organization:

Title:

Comments: My comments to this NF Nooksack 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, was core team member on the Canyon Cr WA and contributor to the NF Nooksack WA. 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 Nooksack River 5th field watersheds especially Canyon Creek; 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).

Comment #1

The NF Nooksack to include Canyon 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. Nooksack including Canyon Creek are watersheds having multiple wild fish populations at risk. Key Watersheds has 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. None of the posted NF Nooksack Vegetation Management documents have this land allocation designation.

Comment #2

The NF Nooksack Vegetation Management Project is posted having no new or updated Watershed Analysis. The posted Canyon Creek Analysis and NF Nooksack River Watershed Analysis (both done in 1995) don't cover this vegetation proposal. 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. In fact in the updated Transportation Plan document, in the Riparian Reserves standards and guidelines, RF-2 and FR-3 call for Watershed Analysis because 16 miles of temporary roads on existing road prisms will be reconstructed and 1.5 miles of new temporary roads will be built. In the Revised Final EA - Section2 the preferred Action Alternative- Modified calls for commercial thinning of up to 743 acres and 502 acres of non-commercial thinning in Riparian Reserves. Any new road and vegetative manipulations in Key Watersheds and Riparian Reserves requires Watershed Analysis. No new or updated Watershed Analysis supports these proposed actions. 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. Watershed Analysis was designed to support and contribute to decision making documents such as EA's and EIS's.

Comment #3

Canyon Creek has been a 5th field watershed with an extensive history of watershed restoration. The attached document summaries this effort. Besides restoration treatments within the Forest boundaries major restoration work in the private ownership area has occurred, including \$5.6 million spent in the past to complete restoration efforts in lower Canyon Creek. In 1989 and 1990, three floods carried large amounts of water and debris down Canyon Creek, destroying four homes, a county road, and a private resort. The floods also destroyed important salmon habitat in the lower reach of Canyon Creek that was used by a variety of salmonids. This proposal should include the Forest's watershed restoration history as supporting documentation.

Comment #4

The Forest's road systems in the NF Nooksack and in particular Canyon Creek 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 a 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 31 system in Canyon Creek experiencing 17 road system damage sites from 8 flood events (1974-2003); and Rd 39 system in Glacier Cr experiencing 12 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. The revised EA decision was justified on flood damage to Rd 39 from the mid-Nov 2021 storm and flood events. The EA says from known field information, this damage to Rd 39 was the only road damage concern. In my opinion, I think it should be disclosed what other road systems in the NF Nooksack 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 Nooksack 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 determine upon project implementation. I really don't understand how the Forest will conduct/complete ESA-Section 7 consultation and NMFS Essential Fish Habitat on these projects. Formal consultation will be required because these projects will be called Likely to Adversely Affect (LAA) as shown in the EA's.

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 2, 2022