

# Stillaguamish Watershed Chinook Salmon Recovery Plan

Stillaguamish Implementation Review  
Committee

## COMMENT RESPONSE MATRIX June 30, 2004 Draft



Com ment No.	Reference Page Number	Comment	To be Completed by Staff		
			Response	Editor	Notes
1.	General	Coordination of the 14 local watershed plans: What is the mechanism by which the 14 plans will be processed, and what will the outcome of the process be?	Letter sent 11/15	√	John Koster
2.	General	Inter-jurisdictional coordination: How does the SIRC envision coordination & cooperation of the various jurisdictions within the watershed?	Letter sent 11/15	√	John Koster
3.	General	Are jurisdictions within the watershed required to adopt any/all elements of the plan? What if they opt out of all or portions of it?	Letter sent 11/15	√	John Koster
4.	General	<p>The Stillaguamish Chinook Recovery Plan does not include a description of the economic impact and benefit of a healthy Chinook salmon recovery effort. Such a discussion could help build support for the local commitments that will be needed for the recovery plan to be effective. The economic significance of the commercial and sport fishery in Snohomish County along with the attractive natural environment for bringing talented companies and employees to Snohomish County is not mentioned.</p> <p>The County GPP's do include a reference to the commercial and recreational value of healthy salmon populations. The County GPP states that "Snohomish County's commercial and sport fishing industries rely on the 44 stocks of salmon and steelhead that are produced in local watersheds. The beauty and value of local waters also are important reasons people choose to live here". NE-3. This quote is actually from the Natural Environment section of the GPPs and not the economic development section.</p> <p>Both the Chinook recovery plan and the County GPPs could be more direct in discussing the positive economic benefits of a healthy Chinook salmon stock on the local and regional economy.</p>	Letter sent 3/25	√	PDS
5.	General	Long-term planning: What is to happen following the 10 year planning horizon that is contained in the plan?	Letter sent 11/15	√	John Koster
6.		<p>Additional maps (or revisions to existing maps) showing the following would be helpful:</p> <ul style="list-style-type: none"> <li>· Subbasins</li> <li>· Port Susan, Skagit Bay, Port Gardner (for nearshore description)</li> </ul>	Will be included in Final Plan	√	Various

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		<ul style="list-style-type: none"> <li>Hatt Slough</li> <li>Old Mainstem</li> </ul>			
7.	General	Habitat Conservation: I would like you to consider including the concept of mitigation banking and conservation banking in the Stillaguamish salmon recovery plan. Mitigation and Conservation banking can be an important tool in restoring large blocks of river/wetland/riparian habitat, and can be used to support a "no net loss" concept for these habitat types. We have the only NOAA Fisheries' approved habitat bank for endangered chinook (on the Sacramento River). It includes restoration of several hundred acres of estuarine and shaded riparian habitat. We are also currently restoring side channels and riparian forest on a 300-acre site adjacent to the Skagit River. I could make a presentation to the group on our efforts in restoring several hundred acres of riverine habitats here in western Washington, and how the mitigation concept works. I can also help provide text that's been used in other planning/restoration efforts – to link local plans to state and federal policies. I am currently actively looking for property in the Stilly basin for the purposes of restoration of wetland, riparian, estuary, and riverine habitat for mitigation banking.	Topic to be considered by SIRC	√	Sky Miller
8.	Acknowledgements	Give credit to SIRC, SWM, Tribe, Shared Strategy/TRT, etc.	Will be included in Final Plan	√	Various
9.	1	What does it mean to provide "guidance to local stakeholders..." to protect salmon in the watershed? To what extent will these recommendations become requirements for funding, permitting, etc.? Some clarification of intent is called for here.	Letter sent 11/15	√	John Koster
10.	3	Do we have updated land use statistics, possibly in the 10-year Comp Plan Update? These statistics are from 1995. (Also on bottom of p. 14)	Data not available at this time	√	SWM
11.	Fig 2	Chinook Distribution: Do fish actually stop migrating up Pilchuck Cr & NF Stilly at the county line? If so, what factors limit their migration?	Letter sent 3/25	√	SWM
12.	11	North Fork (Summer) Chinook Salmon: Based on years of surveys, move Chinook eyed stage to mid-October – mid-November; hatching in November	Plan text revised	√	Pat Stevenson

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13.	11 ¶3	North Fork (Summer) Chinook Salmon: "...and eggs usually are buried..." Should say "are usually buried" to match form of 1 <sup>st</sup> clause.	Plan text revised	√	SWM
14.	12 ¶4	Bull Trout: How much do bull trout overlap with Chinook? Do BT migrate out into the sound?	Letter sent 3/25	√	SWM
15.	12	Nearshore Habitat Populations: Perhaps rename this section something like "Non- Stillaguamish salmonid use of the Port Susan estuary/nearshore". The present title is a bit confusing. On a side note, I should have some CWT data pretty soon (next 1-2 years) that hopefully can shed some light on how much out of basin use the estuary is getting.	Plan text revised	√	Jason Griffith
16.	13	Focal Species: "focal" is awkward; is there a better word?	Heading changed	√	SWM
17.	13	Habitat Requirements of Chinook Salmon: During upstream migration, Chinook need large deep cold pools for holding prior to spawning.	Plan text revised	√	Pat Stevenson
18.	14	Habitat Requirements of Chinook Salmon: Insert nearshore/estuary habitat requirements	Plan text revised	√	SWM
19.	14 ¶5	Factors Affecting Chinook Populations - Population and Land Use: "...hydrologically connected areas..."	Comment noted in Plan	√	SWM
20.	14	Factors Affecting Chinook Populations - Population and Land Use: As depicted in Figure 4, the Future Land Use taken from the Comprehensive Plan does not anticipate to significantly alter or plan for major population increases in this watershed. Nominal population increases are expected surrounding the Arlington UGA and the Stanwood UGA and a small commercial expansion in the vicinity of Darrington to increase employment opportunities in that community. Please make sure that this plan dovetails with the City of Arlington's plans for NPDES and ESA compliance.	Letter sent 3/25	√	PDS

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21.	17	Factors Affecting Chinook Populations – Forestry: It would be helpful to know where and how much federal forest land will be managed for timber harvest.	Refer to Forestry Policy Analysis (Edwards 2003)	√	SWM
22.	17 and 57, Integrated Actions for Recovery	Factors Affecting Chinook Populations – Forestry: The Stillaguamish Chinook Salmon Recovery Plan does not emphasize that the same forestry related solutions needed for Chinook recovery would also have a positive effect on flooding in the lower reaches of the river basin. Retention/creation of mature forest and its impact on seasonal flow is a big positive related to flooding and should be highlighted as an additional benefit.  The adopted Stillaguamish River Comprehensive Flood Hazard Management Plan includes specific information on the costs of flooding and the large cost of the range of projects needed to handle flood waters in the basin. Some of the language and costs listed in the flooding plan help make the argument that changes in forest practices that would help reduce peak flooding also help improve Chinook habitat. Showing the benefits of changes in forest practices for both flooding and Chinook recovery could help build support for the plan and gain commitments to help with the recovery effort.	Letter sent 3/25	√	PDS
23.	18	Factors Affecting Chinook Populations - Agriculture: Provide description of impacts from hobby/non-commercial farming in the watershed.	General impacts of agriculture discussed	√	SWM
24.	18 ¶4	Factors Affecting Chinook Populations - Agriculture: "...are also important..." In addition to what? Will be or are important?	Comment noted in Plan	√	SWM

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25.	18	Factors Affecting Chinook Populations - Agriculture: The negative impacts of agriculture on fisheries and fisheries recovery are described. Why is the conversion of agricultural use to some other use such as rural residential considered more damaging to fisheries? If agricultural use, with its negative impacts, is preferable to rural or urban residential use, then a discussion of the benefits of agricultural use could help build support in the agricultural community.	Letter sent 3/25	√	PDS
26.	18	Factors Affecting Chinook Populations - Urban/Rural Land Use: Are population estimates/projections available for the Stillaguamish watershed only, rather than the whole county?	Text revised	√	SWM
27.	18 and 19	Factors Affecting Chinook Populations - Urban/Rural Land Use: This plan section describes the contribution of rural and urban land conversion on declining salmon populations. There is a statement that the "conversion of agricultural land to rural residential uses will limit the effectiveness of ongoing salmon recovery efforts throughout the watershed." This is not well explained.	Letter sent 3/25	√	PDS
28.	19	Environmental Policies and Regulations – Growth Management Act: Include Darrington in GMA/UGA discussion.	Plan text revised	√	Pat Stevenson
29.	20 ¶1	Environmental Policies and Regulations – Growth Management Act: "...CARs requires..."	Plan text revised	√	SWM
30.	19-20	Environmental Policies and Regulations – Growth Management Act: Add specifics of Snohomish County critical areas regulations and shoreline master program updates.	Not available at this time	√	SWM
31.	20	Environmental Policies and Regulations – Shoreline Management Act: What specific areas in the watershed are under the jurisdiction of the SMA?	Data not available at this time	√	SWM

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32.	21-22	Factors Affecting Chinook Populations – Forestry: The Snohomish County General Policy Plan, GPPs, contains sections on forestry, GPP Goal LU-8. Forestry goals and policies in the County GPPs do not include a goal or policy to conduct forest practices in a manner that are consistent with the draft Chinook recovery plan. Forestry policies that would be consistent with the direction of the Chinook recovery plan would include encouraging the growth and retention of mature forests, limiting erosion from forest road construction, encouraging efforts to limit the impact of landslides on sedimentation of rivers and making efforts to control peak water runoff from clear cut logging operations.	Letter sent 3/25	√	PDS
33.	21	Forestry Policies and Regulations: Add following to the end of the 2nd paragraph: “The significance of the small landowner exemption is unknown because the total acreage involving such owners in the watershed has yet to be determined.” Reason for this addition: Until the significance of the small landowner exemption is quantified, addressing a correction is unknown. The Forest Practices Board allowed the exemption because of the severe impact the new regulations would have caused for a number of small landowners with excessive numbers of streams on their small acreage. Most small landowners enjoy owning trees, however, and may not harvest in a clearcut anyway, so the exemption is believed to not be significant to water quality.	Comment included in Plan text	√	Duane Weston
34.	22	Forestry Policies and Regulations: Discussion of the Habitat Conservation plan includes limits on timber harvesting, road building in the rain on snow zones. Clarify what the “Rain on Snow Zone” is and why land management should differ from other areas, such as low lands, or high elevations.	Footnote added	√	SWM
35.	22	Habitat Limiting Factors: Add the word ditching as follows: “Riparian and upland clearing, ditching, and associated road construction...”	Comment noted in Plan	√	Duane Weston
36.	23	Habitat Limiting Factors – Riparian Areas: Factors of Decline-Deforestation bullet mentions use of the river for transporting logs as the cause of large landslides, with less emphasis on removal of trees on the slope. Could be clarified. I don’t think Gold Basin was caused by deforestation.	Text revised to clarify impacts of deforestation	√	Karen Chang
37.	23	Habitat Limiting Factors – Riparian Areas: Re: Armored banks in mainstem Stillaguamish: Corps of Engineers maintains (i.e. cuts vegetation on revetments along) ~ 15 miles of river channel.	Letter sent 3/25	√	Sally Lawrence

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		The maintenance prevents establishment of mature riparian buffer needed to prevent stream heating, and the armoring disconnects river from floodplain hydrologically.			
38.	24	Habitat Limiting Factors – Riparian Areas - Current Conditions: Define “low quality” riparian zone.	Text revised to clarify riparian areas	√	SWM
39.	24 Table 1	Habitat Limiting Factors – Riparian Areas: Text preceding table is confusing. Where is the “lower floodplain”? Also, text mentions that 52% of riparian buffer is forested, but 52% doesn’t show anywhere in the table.	Letter sent 3/25	√	SWM
40.	24	Habitat Limiting Factors – Estuary/Nearshore: “Chinook salmon fingerlings generally enter the estuary in the late winter or early spring and may reside in this environment until early fall.” Is this timing accurate? Different for stream-type and ocean-type? Is this Stilly-specific or general for all salmon? Provide reference.	Text revised with additional information	√	SWM
41.	25	Habitat Limiting Factors – Estuary/Nearshore - Historical Conditions: Instead of “863 acres of material was accreted” maybe something like “863 acres of salt marsh was created through accretion of sediment into Port Susan”.	Text revised	√	Jason Griffith
42.	25	Habitat Limiting Factors – Estuary/Nearshore - Historical Conditions: Table 2 needs a bit of clarifying. Starting with the title, I suggest renaming it to: “ Estimates of Historic and Current Salt Marsh Habitat in Port Susan”. The final column also needs to be renamed to something like: “Newly accreted since 1968”. Finally, “Total of original and new” at the bottom could be clarified to something like: “Acreage Present Today”	Table revised	√	Jason Griffith
43.	25	Habitat Limiting Factors – Estuary/Nearshore - Factors of Decline: Integrate the nearshore hypotheses from page 33 into this section and flesh out the existing bullets with a more mechanistic description of how the given factor is furthering habitat degradation in the nearshore. I think we have a bit of data to back up some of points (i.e. we have armoring data for both Snohomish and Island County shorelines, and Greg Hood’s work in the Skagit linking distributary habitat loss to diking).	Plan text revised	√	Jason Griffith
44.	26	Habitat Limiting Factors – Estuary/Nearshore - Current Conditions: Add reference to the Stanwood sewage treatment plant.	Text revised to incorporate	√	SWM

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			reference		
45.	28	Habitat Limiting Factors – Floodplain - Current Conditions: How much of the Stilly floodplain (acres or %) remains unconstrained?	Data not available at this time	√	SWM
46.	30	Habitat Limiting Factors – Sediment: Discuss the usefulness of Table 5, since field review is really necessary to determine stability.	Plan text revised	√	Pat Stevenson
47.	31	Habitat Limiting Factors – Hydrology: First bullet under Factors of Decline should be changed to read: “Deforestation: Clearing of mature forest vegetation over large areas of the watershed and construction and retention of roads in upland forest areas has reduced natural infiltration...” Reason for addition: Deforestation is not the cutting of mature timber. While the majority of the original mature timber in the watershed has been harvested, 76% of the watershed is still forested. What has occurred in the forested areas that has increased runoff rates and peak flows has been the deforesting and ditching necessary to construct and maintain roads in forested areas. Our statement must be clear that deforestation is clearing land for another use.	Text revised	√	Duane Weston
48.	32	Habitat Limiting Factors – Hydrology - Current Conditions: “approximately 53% of the entire Stillaguamish watershed is forested” – does this mean hydrologically mature forest?	Yes, text revised	√	SWM
49.	32	Habitat Limiting Factors – Hydrology: Last sentence to be modified and shortened, and another one added to read: “Potential low instream flow in sub-basins was identified as contributing to limiting Chinook production. While the list is not complete, the following sub-basins are identified: ...” Reason for suggested wording: I believe numerous streams not listed on page 33 have low summer flows that affect Chinook production and we should not leave the impression the ones listed are the only ones. Further, some of the streams listed have always had low flows in the 40 years I have observed them, so to list them now is nothing that has recently occurred.	Text revised	√	Duane Weston
50.	32	Habitat Limiting Factors – Hydrology: Combine Harvey and Armstrong Creeks into one bullet as Harvey Armstrong Creek. Reason: Armstrong Creek drains from Lake Armstrong into Harvey Creek and is only a few hundred feet in length. Combining them as one creek also matches how they are shown in Table 6 on page 32. Additional comment: I question why Trib 30 and Harvey Armstrong Creek are even listed as Chinook streams. They have always had low summer flows	Text revised	√	Duane Weston

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		in the 40 years I have observed them, and if Chinook smolts came out of the nests in December and January and leave freshwater by April or May, their use of these small creeks occurs when flows are not a problem. My observation is these two subbasins have always been coho, steelhead, cutthroat, and chum streams anyway, so saying they are significant for Chinook production is a bit puzzling to me. If listing these two subbasins is important, then what about Portage Creek, Rock Creek, Koote Creek, Jim Creek, etc.? They seemingly would be useful to Chinook as well and they too have low flows during summer months.			
51.	33	Nearshore: Discussion could be grouped w/ Estuary/Nearshore discussion on pp 24-26. Also, what exactly are "overwater structures"?	Plan text revised	√	SWM
52.	35	Factors Affecting Chinook Populations – Water Quality Degradation: What are the results of the Tribe's monitoring efforts? Please provide specifics. Locations, point sources, non-point sources, etc.	Will be included in Final Plan	√	SWM
53.	35	Factors Affecting Chinook Populations – Harvest: In the section on Harvest the report states "Chinook Salmon ... are vulnerable to harvest", and "Due to high harvest rates and ongoing watershed disturbances ... Stillaguamish Chinook ... exhibited declines in abundance and were ultimately listed as Threatened under the ESA in 1999." Notwithstanding these factual notes, the fundamental presumption underlying the recovery plan is that the problem is one of habitat, not harvest. Yet for the recovery plan to be effective, the remedy must be properly ordered to the cause. Indeed the remedial focus would be far different if the problem were harvest rather than habitat. This question calls for careful research, and the avoidance of presumption.	Letter sent 11/15	√	John Koster
54.	35	Factors Affecting Chinook Populations – Harvest: "Despite the cessation of targeted fisheries in Washington, indirect and direct harvest still occurs..." Define indirect and direct harvest.	Plan text revised	√	SWM
55.	36	Factors Affecting Chinook Populations – Hatchery: The negative stance taken toward hatchery fish seems inadequately founded and possibly inconsistent with the purpose of the plan. The concluding paragraph on p. 37 of the "Hatchery" discussion that begins on p. 36 contains for its operative verbs "can have" and "may", rather than "does have" or "does", appears to suggest conclusions that the literature doesn't actually support. Moreover, employment of the word "theoretically" in the concluding comment "increased hatchery production theoretically makes more fish available for harvest, resulting in increased harvest pressure on wild salmon" has the probably unintended effect of downgrading the factual to the hypothetical. It is an arithmetic fact,	Letter sent 11/15	√	John Koster

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		not an hypothesis, that production of hatchery fish increases the number of fish available for harvest. I suggest rewriting this section to be consistent with the discussion on page 1 reflecting that the purpose of helping salmon populations recover to sustainable and harvestable levels is to assure a continuing and reliable abundant food supply for humankind.			
56.	39	Planning Targets for Independent Populations: Is the footnote in the last paragraph necessary? Could insert last 2 sentences after first. Or is the definition footnoted with the intention of referencing another study/report?	Footnote deleted	√	SWM
57.	40	Planning Targets for Independent Populations: Why do you show / explain population curves, but not show actual curves for the Stilly?	Letter sent 3/25	√	SWM
58.	41	Viable Salmon Populations – Productivity: The discussion on productivity / growth rate is confusing. In the first sentence the terms are defined to be equivalent, but subsequent sentences show they are not exactly the same thing.	Letter sent 3/25	√	SWM
59.	42	Ecosystem Diagnosis and Treatment: Footnote 8: "...the upper limit..." of what? Could eliminate footnote by inserting sentence into paragraph.	Comment noted in Plan	√	SWM
60.	42	Ecosystem Diagnosis and Treatment: Provide more detailed history of using EDT in the Stillaguamish.	Text revised to clarify use of EDT	√	SWM
61.	43	Ecosystem Diagnosis and Treatment/Properly Functioning Conditions: "EDT estimates..." "...(PFC) have been modeled by EDT..." The way it is written makes it sound like EDT is a company/ organization or something.	Text revised	√	SWM
62.	43	Properly Functioning Conditions: Could list the 6 habitat limiting factors categories at bottom of page (similar to list of VSP parameters)	Comment noted in Plan	√	SWM
63.	43	Properly Functioning Conditions - Riparian: What is the meaning of the acronym STAG?	Footnote added	√	SWM
64.	43 – 45	Properly Functioning Conditions: Who sits on the STAG (Stillaguamish Technical Advisory Group)? How did they reach their conclusions for each of the habitat limiting factors (e.g. 80% of historic estuarine and nearshore habitat must be accessible and usable for properly functioning conditions; 80 pieces of LWD/mile must be added to the mainstem for PFC; no more than 10% of	Letter sent 11/15	√	John Koster

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		streambanks in any reach may be hardened for PFC).			
65.	44	Properly Functioning Conditions – Riparian: Who owns the 8,000 acres of riparian area that would be "...planted, restored, maintained and protected.." to achieve recovery? If these are private holdings, how will the landowners be compensated? Is that cost included in the cost estimates?	Letter sent 11/15	√	John Koster
66.	44	Properly Functioning Conditions – Estuary: Is it possible to restore 3,500 acres of estuarine area without removing homes or roads?	Feasibility uncertain; restoration target re-calculated to 2,020 acres.	√	SWM
67.	44	Properly Functioning Conditions – LWD: This section describes the need for 62 engineered log-jams on the river system, with minimum log size of 24" DIA x 50' LONG. The cost of these log-jams is very high and their longevity is very uncertain. Furthermore, the use of only logs that meet the minimum size criteria doesn't seem to replicate the diverse hodge-podge of material that Mother Nature builds with. The volume of small-medium-large woody debris that every flood brings downriver is tremendous. That material poses serious problems when it accumulates against bridge piers. Most of the material ultimately ends up on the beaches of the Sound. Why not use it to build log-jams on the river as it floats downstream? Log booms could be strategically placed in the river, perhaps anchored with chains and environmental blocks. They would be angled upstream from near-shore outward in such a way that they trap down-flowing woody debris and accumulate it in selected holding areas. It seems like we could build and rebuild log-jams every year, in a very natural way, and virtually "free of charge". One side comment on log jams---I've seen and helped with a bunch of near-tragedies when summertime river floaters get tangled up with a log. Every summer you read about river floaters that drown. Could an angled diversion boom be installed upstream to push floaters safely out of harms way? At a minimum, as we begin to install more of these obstacles, river safety info needs to be publicized and maybe even signs at danger points along the riverway.	Comment noted in Plan; concept will be considered in future restoration projects	√	Bill Best

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68.	44	Properly Functioning Conditions – Floodplain: The gap... is (removal of?) 4.1 miles of existing hardened bank??? Also might mention percentage of hardened bank on lower stilly (> 50%)	Text revised to clarify	√	SWM
69.	44	Properly Functioning Conditions – Floodplain: Recommendation is no more than 10% hardened. The “gap between current conditions and achieving this ...is 4.1 miles of existing hardened bank”. The actual mileage is not clear. Recommend including a small table showing existing mileage of stream that is hardened, for North and South Forks and lower mainstem.	Text revised to clarify	√	Sally Lawrence
70.	44	Properly Functioning Conditions – Floodplain: Define what is meant by “reach” in determining what 10% hardened will be.	Footnote added	√	Pat Stevenson
71.	44	Properly Functioning Conditions – Floodplain: Does the recovery plan recommend removal of the 4.1 miles of existing protected bank that represents the gap between current conditions and the 10% target? How is this better for fish than preventing bank erosion that can add sediments, toxic chemicals and other debris into the river? It would seem that bank protection could be a significant part of the overall remedy.	Letter sent 11/15	√	John Koster
72.	45	Properly Functioning Conditions – Sediment: In the discussion of sediments and the problem of landslides and unstable banks, the plan states “It is unknown to what degree the attenuation of these sources will lead to properly functioning conditions”? Does the SIRC envision recommending attenuation even though the results are unknown?	Letter sent 11/15	√	John Koster
73.	45	Properly Functioning Conditions – Sediment: If unstable banks are a problem, how does the goal of reducing sediments in the spawning areas correspond with the goals to limit bank protection efforts? Again, it would seem that bank protection would be part of the remedy for reducing sedimentation due to unstable banks.	Letter sent 11/15	√	John Koster
74.	45	Properly Functioning Conditions – Sediment: Should the (<6.35mm) follow “fine sediment”? What measures / surrogate measures could be used to address sediment sources? What should the recovery target for these measures be?	Letter sent 3/25	√	SWM
75.	45	Properly Functioning Conditions – Hydrology: What is current % immature forest cover in sub-basins referenced? What do you mean by “overly conservative”?	Letter sent 3/25	√	SWM
76.	45	Properly Functioning Conditions – Hydrology: Is it a realistic goal to maintain immature forest levels in the subbasin at a level below 12%? How does this correspond with existing land uses? Will the plan propose changes in land use regulation? Is there a plan to compensate voluntary	Letter sent 11/15	√	John Koster

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77.	45	Properly Functioning Conditions – Hydrology: “This assumption may be overly conservative given current land use pressures and forest management trends toward marketing smaller logs to processing plants.” I suggest using “optimistic” rather than “conservative” since without financial incentives to private forest land owners, increasing 37,639 acres of immature forest to mature will be very optimistic, if not impossible.	Comment noted in Plan	√	Duane Weston
78.	45	Properly Functioning Conditions – Hydrology: What is the “optimum” level for instream flows, how is that defined, and how will that be achieved? Also, how does the “optimum” level differ from the “minimum” level to ensure recovery goals? (Is “optimum” being used here as though synonymous with “minimum”?) Also, who will determine what this optimum (minimum?) level is, and upon what basis?	Letter sent 11/15	√	John Koster
79.	45	Properly Functioning Conditions – Hydrology: Who sets instream flows? What is the target for recovery?	Letter sent 3/25	√	SWM
80.	47	Guiding Principles: “Integration” - Plan integrates both water quality and salmon recovery issues. This is an enlightened approach that Ecology can support.	Comment noted in Plan	√	Sally Lawrence
81.	47	Guiding Principles: “Community” - Are “economic values” the same as economic vitality?	Letter sent 11/15	√	John Koster
82.	47	Guiding Principles: “Landownership” - Is there a plan to compensate landowners? What if they don’t want to participate? Is there a plan to compel landowner participation?	Letter sent 11/15	√	John Koster
83.	47-48	Guiding Principles: “Regulation”: Include revisions to existing regulations and potential new regulations where necessary.	New habitat protection section	√	SWM
84.	51	Harvest Strategy: Suggest adding a paragraph to Harvest Strategy as follows: “The SIRC believes poaching of adult Chinook in the watershed to be a serious impact to annual Chinook production and the SIRC will explore how this issue might be prevented.” Reason: Each female adult Chinook that is poached removes 3500-4500 eggs from the production potential. That is a	Text revised	√	Duane Weston

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		significant loss and needs to be stopped.			
85.	53	Integrated Strategy: Define spawner-recruit curves. What are recruits?	Definition on p. 40	√	SWM
86.	54/55	Integrated Strategy: Fig's 7 & 8 show the same curves. If both habitat and harvest conditions are optimized, shouldn't the population curve rise accordingly? Also, how do the equilibrium abundance targets from Table 7 fit in with this discussion?	Letter sent 3/25	√	SWM
87.	57-65	Integrated Actions for Recovery (10-Year Strategy): Is there a plan for sequencing (prioritizing) the proposed actions? Are some actions required to be completed before others can be implemented?	Letter sent 11/15	√	John Koster
88.	57-65	<p>Integrated Actions for Recovery (10-Year Strategy): The projects described for riparian, estuary and floodplain areas outline actions to occur on private property. Although this will therefore necessitate and benefit from willing landowners, there are no details in the document about how this cooperation will be achieved. Many of the habitat enhancement activities can be accomplished through voluntary BMPs, such as native vegetation, animal exclusion, invasive weed control, etc., and major capital restoration projects will also rely on landowner participation.</p> <p>The plan needs to include specific actions to engage the landowners in the Stillaguamish Watershed to encourage and ensure the implementation of the plans. Fostering participation and stewardship by private landowners will provide the foundation for success - whether individual actions are carried out on public or private properties. In order to effectively accomplish this, objectives and approaches to increase willingness of landowners to participate in plan implementation should be detailed and presented within the plan document. Programmatic components should include, at a minimum, public awareness, education, engagement and stewardship as specified activities. These should be presented with substantive detail so that implementing entities can effectively accomplish the above goals.</p> <p>Examples of how to present this type of plan content can be found in the <u><a href="#">Draft Snohomish River Basin Salmon Conservation Plan</a></u>, section 9.4.</p>	Letter sent 3/25	√	SWM

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89.	58	Riparian Project Types: What are "pest control measures" and how will contribute to recovery?	Text revised	√	SWM
90.	59	Approved Riparian Projects: Does "restore" include the removal of dikes, roads, etc. as discussed on page 58?	Letter sent 11/15	√	John Koster
91.	59	Estuary: Perhaps add "/Nearshore" header? Also, under "Overall habitat enhancement" I think we should explicitly state that restoration and enhancement of blind tidal channels and salt marsh habitat will be through dike removal and setback (citing Hood's work). There really is not another way unless we wait a few hundred years for the Stillaguamish to build a new delta. But maybe this was left out for political reasons?	Text revised to incorporate comment	√	Jason Griffith
92.	60	Estuary: Perhaps add a header entitled "Potential . ." or "Recommended Projects"? I think it is important to name those areas we feel should be restored immediately. Sites like English Boom or Iverson come to mind quickly, but there also is potential at Triangle Cove.	Text revised to incorporate comment	√	Jason Griffith
93.	60	Approved Estuary Projects: Does "restore" include the removal of dikes, roads, etc. as discussed on page 58?	Letter sent 11/15	√	John Koster
94.	60	Approved Estuary Projects: Due to subsidence, there is absolutely no way that 18 acres of blind tidal channels will be established on the 80 acres of diked Nature Conservancy property within a 10 year time frame. If the dike is breached, you will end up with an 80 acre tidal lagoon (which would still be valuable). The targets of 18 acres of distributary and 120 acres of estuary from construction of the delta log jams are most likely extremely optimistic in a 10 year time frame. I don't see how such structures would trap enough sediment to build the elevations needed.	Proposed project is experimental; results will monitored for adaptive management	√	Jason Griffith
95.	61	Approved Estuary Projects: Bullet 3 (top of the page) is a bit troublesome to me. I think is highly optimistic and perhaps delusional to say we are going to create 120 acres of saltmarsh by building 10 jams. I think this whole idea was a ACOE design that has not been tested in the real world. I could be wrong . Perhaps we could just say something like we are going to build 10 jams with the aim to increase and enhance channel and marsh habitat in the delta?	See previous response	√	Jason Griffith

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96.	61	Approved Estuary Projects: #3 attempts to create 120 estuary acres by placement of 10 delta log jams. I have asked several times in SIRC meetings for detailed information on this proposal and have never gotten any information. The map in Figure 9 is not detailed at all regarding location of the proposed delta log jams. My feeling is this is not a well thought out proposal. A good proposal would require thorough understanding of Port Susan marine water dynamics and sedimentation processes. Note that on page 34 of this document, "Filling of Tidal Lands" has a "negative effect on sediment transport and tidal exchange, which leads to alterations in the physical and biological habitat features..." How would this proposal avoid those negative effects? Why would the sediment-trapping role of logjams not simply speed up the already rapid process of filling in Port Susan by the excessive sediment load carried by the river?	See previous response	√	Sally Lawrence
97.	61-62	Habitat Projects – Large Woody Debris: The lower mainstem was historically a reach with extensive channel spanning log jams, and little mention (other than North Meander) is made of establishing jams in this reach. It is not listed as a second priority on Figure 11, and probably should be if we hope to restore a portion of the rearing habitat that was lost during the later part of the 19th century.	Comment noted in Plan	√	Jason Griffith
98.	62-63	Floodplain – Geographic Criteria: Where are "key spawning areas"?	Included in pp. 7-12	√	SWM
99.	63	Approved Floodplain Projects: I am concerned about the lack of any targets related to removal of bank armoring in the 10-year work plan. Removal of armoring is discussed in the 2nd chapter, and targets are mentioned as far as armoring removal on the North and South Fork (removal of 4.1 miles of hardened bank). No mention is made of armoring removal in the mainstem Stillaguamish. The mainstem is the most heavily hydro-modified reach and one where there was historically abundant side channels and much more channel migration. The lower mainstem is omitted from Figure 10 as a first or second priority for Floodplain.	Text revised	√	Jason Griffith

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100.	63-64	<p>Sediment: It is clear that several large landslides in the vicinity of Steelhead Haven, the old Deer Creek Slide on the north fork and north of Gold Basin on the south fork, as well as the extreme channel migration at Chatham Acres on the north fork and at Robe Valley on the south fork has caused extensive downstream sedimentation and loss of habitat.</p> <p>Landslide repairs most likely will require grading permits and engineering review to complete this work. If public roads are intended to be de-commissioned, please coordinate this plan with the Department of Public Works or the Forest Service depending on the nature of the roadway.</p> <p>Please explain the nature of the treatment intended for road de-commissioning projects. (Does this mean they will be revegetated or planted to become forest again?) (Will access to other private parcels be impaired by this proposal?)</p>	Letter sent 3/25	√	PDS
101.	64	Approved Sediment Projects: What does "treatment" of forest roads include?	Letter sent 11/15	√	John Koster
102.	65	Habitat Project Costs: Does this include costs of land acquisition and/or compensation to willing landowners that participate?	Letter sent 11/15	√	John Koster
103.	77	Policy and Regulatory Issues – Compliance and Enforcement: Add the following sentence to the first paragraph: "Cooperation in the courts in convicting and imposing stiff fines on poaching violators would be very helpful in solving this issue."	Text revised	√	Duane Weston
104.	77	Policy and Regulatory Issues – Land Use Regulations: Currently, the Snohomish Shoreline Master Program, the Critical Areas Code and the overall County GPPs are under review and update. As suggested on page 77, the SIRC could recommend changes to the Snohomish County draft GPPs, Shoreline Master Plan and Critical Areas Code updates to assure that goals, policies and objectives along with code requirements are included that are consistent with the Chinook Salmon Recovery Plan.	Text revised	√	PDS

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105.	78	Policy and Regulatory Issues – Forest Practices: Be consistent on 88% mature vs. 65% forest cover; is cover hydrologically mature – e.g. over 20+ years?	Text revised to 80% (PFC)	√	Pat Stevenson
106.	79	Policy and Regulatory Issues – Water Quality: Good discussion of need for local jurisdictions to develop stormwater programs. This will be critical to averting the negative impacts of stormwater on river water quality as growth and development occur.	Comment noted in Plan	√	Sally Lawrence
107.	80	Policy Commitments and Coordination: The need to engage the Corps of Engineers in review and modification of riparian maintenance policy could be mentioned here and on page 85: Long-Term Planning Issues – Floodplains.	Text revised	√	Sally Lawrence
108.	82	Research and Data Gaps – Estuary: Both of these are "In progress" We have the habitat data, and one year of fish use data. I am working on securing funding for additional years of seining. Do you know of anyone with a spare 30K per year?? I should have the habitat report out within the next six months. I also have a very brief write up of our seining efforts from this year.	Text revised	√	Jason Griffith
109.	83	Public Education: Instead of a Public Education and Outreach "plan" (to be developed in 2004), a "strategy" will continue to be implemented.	Comment noted in Plan	√	Pat Stevenson
110.	83	<p>Public Education: In the entire one-hundred page plan, the public education, outreach, and stewardship component is just 2 paragraphs long – one of which describes outreach for Plan itself – not recovery actions described by it. There is no description of any public education/stewardship strategy or actions, yet many of the recovery actions described depend in part or in whole upon public support, willing landowners and voluntary actions by citizens.</p> <p>The brief public education paragraph states, "public education and involvement are also necessary components to successfully achieving salmon recovery objectives," yet fails to justify the statement with any substantive program or goals. In its lack of detail and substance, the public education and outreach component is remarkably inconsistent with other portions of the plan, and there is no real description of stewardship or widespread property owner participation – overlooking a significant opportunity to foster recovery.</p> <p>Several limiting factors for Chinook salmon can be directly addressed by individual landowners</p>	<p>Letter sent 3/25</p> <p>New Public Education/ Stewardship section</p>	√	SWM

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		<p>on their own property, given proper direction and assistance. In fact, at a landscape level, substantive public education/engagement is the only way to directly address some limiting factors. Research indicates that, while residents care about salmon recovery, they lack knowledge of what specific steps individuals can (or should) do to help salmon. They also benefit from technical assistance and resources to accomplish the work.</p> <p>Therefore, the Public Outreach and Education section should, at minimum:</p> <ol style="list-style-type: none"> <li>1) Expand to capture the concept of fostering stewardship</li> <li>2) Establish a set of goals that will enable residents to practice individual stewardship/BMPs and implement specific physical changes that will benefit salmon.</li> <li>3) Provide outreach professionals with goals and strategies that a) define what specific activities residents should do, b) define what specific information residents should know, c) establish consistent watershed-wide educational messages, and d) establish technical assistance resources and guidance.</li> </ol> <p>Identify and delineate between a) activities intended to promote the salmon conservation planning process, b) actions intended to promote general public awareness of the issue, c) activities intended to promote best management practices for salmon conservation.</p>			
111.	83	Long-Term Planning Issues: What is meant by "long-term"?	Text revised	√	SWM
112.	84	Acquisition: "Regulatory Protection should be used in high quality habitats where owners are not fully prepared to relinquish property rights..." Several sections of the Plan refer to "fee-simple or conservation easement acquisition". I consider myself to be one of the private landowners that will be an involved supporter of the ultimate Plan. But, I want to do it and will do it voluntarily. I do not wish to relinquish my property rights, through fee-simple purchase or conservation easement, to further the objectives of the Plan. While the words "willing landowner" appear in a couple places in the Plan, that concept is not explained along with the fee-simple/easement language in a way that clearly defines the intended usage of these divergent approaches. I know that you have had other inputs on this issue. I want to cast another vote for "Voluntary Landowner Co-operation" as the baseline approach, and I'd like to see that in the Plan.	This Plan is voluntary – landowners will not be subject to acquisition or easements without willing participation	√	Bill Best

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113.	85	Agricultural Viability: "Viability" should be a heading for agriculture, forestry, and fishing (and not just tribal fishing).	Comment noted in Plan	√	Pat Stevenson
114.	87	References: References for Collins and Pollock should be the same in Appendix A. Perkins and Collins also.	References revised	√	Pat Stevenson