

# Stillaguamish Watershed Chinook Salmon Recovery Plan

Stillaguamish Implementation Review  
Committee

## COMMENT RESPONSE MATRIX April 13, 2005 SIRC Review Draft



Com ment No.	Reference Page Number	Comment	To be Completed by Staff		
			Response	Editor	Notes
1.	General	Acknowledgments and Title Page need to be included	Included in Final Plan	√	Bill Blake
2.	General	No changes are to be made on maps from original draft	2 new maps to be added	√	Bill Blake
3.	1	Purpose. Paragraph 2, line-5: The "and" needs to be deleted.	Text revised	√	Jason Griffith
4.	1	Purpose. Line 16: Include protection of existing habitat in sentence beginning with "The Plan's recommendations..."	Text revised	√	Stacie Watne, DNR
5.	7	Chinook Salmon. Should read 98-99% for ocean-type Chinook if you are citing our smolt trap work. If this change is accepted, be sure to change the stream type % two lines down.	Text revised	√	Jason Griffith
6.	11	Non-Natal Salmonid Populations. I suggest "Non-Stillaguamish Salmonid Populations". In the body paragraph below I would also suggest deleting "non-natal" from lines 3 and 5.	Text revised	√	Jason Griffith
7.	18	Habitat Requirements of Chinook Salmon. Paragraph 2, line 1: Perhaps this first sentence could be re-worked? Seems a bit clunky.	Text revised	√	Jason Griffith
8.	23	Forestry. Line 3: How much Federal land is really managed for timber production? Much of this is in LSR or other set-asides.	Paragraph added	√	Stacie Watne, DNR
9.	23	Forestry. Paragraph 3, line 9: How about a citation at the end of this sentence? Hartman et. al. 1996	Text revised	√	Jason Griffith
10.	24	Agriculture. Line 9: In the sentence beginning with "Riparian areas and wetlands...", add "resulting in extensive net loss of these important habitats." to the end of the sentence. Add a sentence in this section specifically explaining how wetland loss increases peak flows. Point out the lack of/weakness of regulation on agricultural	Text revised; summary of agricultural regulatory	√	Stacie Watne, DNR

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		activities in riparian areas and wetlands.	framework inserted		
11.	25	Growth Management Act. Line 5: Confusing as land use planning and permitting are done through regulations. Are you trying to say that there also has to be continuous enforcement of regulations after the development is completed?	Text revised	√	Bill Blake
12.	26	Shoreline Management Act. There is no proof submitted to SIRC or past presentations that Snohomish County is including our local Salmon planning in their Shoreline Master plan. This is a technical document so you may state that it has been "suggested".	Personal Comm. with Snohomish County PDS	√	Bill Blake
13.	27	Forestry Policies and Regulations. Line 19: In the section that begins with "The Washington Forest Practices Act...", point out that this is the most restrictive regulation of riparian areas on private forestry land in the US. (reference: Forest Practices Draft HCP)	Text revised	√	Stacie Watne, DNR
14.	27	Forestry Policies and Regulations. For Forestry types "FPA" means Forest Practice Application. How about another abbreviation like "WAFPA" as "WFPA" is already taken by the Washington Forest Protection Association.	Text revised	√	Jason Griffith
15.	28	Forestry Policies and Regulations. Line 7: In the sentence that begins with "The HCP established guidelines...", add which specific federal services were involved in negotiations; US Fish and Wildlife Service and National Marine Fisheries Service.	Text revised	√	Stacie Watne, DNR
16.	28	Environmental Policies and Regulations. Add The Washington State Noxious Weed Law (RCW 17.10 and WAC 16-750)	Text revised	√	Sonny Gohrman
17.	32	Estuary/Nearshore – Historical Conditions. Bottom of page: I think this footnote is incorrect. Present data does NOT include sand and mud flats.	Footnote revised	√	Jason Griffith
18.	33	Estuary/Nearshore – Factors of Decline. <i>Spartina</i> spp. This should be consistent through the entire document using this format. Be careful of the way Latin species are used. There is a proper format for all of this and someone who is familiar should go through the whole document with this in mind, looks bad to not use the proper format.	Text revised	√	Sonny Gohrman

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19.	33	Estuary/Nearshore – Factors of Decline. High Water Temperature, etc.: Do we need the level of detail under the various hypotheses? Since they are relatively general and not backed by data, maybe we would be better off merging the titles of the various hypotheses with the bullets under “Factors of Decline”. . . Seems like a fair bit of space to devote to musings, and it is not in the same vein as other sections in the same chapter (i.e., doesn’t seem to “fit”).	Text revised	√	Jason Griffith
20.	35	Estuary/Nearshore – Current Conditions. Paragraph 3, line 5: Suggest changing the sentence to read “Accretion of sediment into Port Susan has increased the size of the sand and mud flats at the mouth of the Stillaguamish, presently there are over 7800 acres of unvegetated sand and mud flats (Stillaguamish Tribe unpublished data).	Text revised	√	Jason Griffith
21.	35	Estuary/Nearshore – Current Conditions. Paragraph 3, line 13: Currently the release of effluent is continuous, but will eventually release on outgoing tides. The sentence should read “will be” rather than “are” released on a coordinated....	Text revised	√	Bill Blake
22.	36	Large Woody Debris – Historical Conditions. Line 5: Delete “most likely”.	Text revised	√	Jason Griffith
23.	37	Large Woody Debris – Current Conditions. Maybe a definition of what constitutes a piece of LWD would be nice in this paragraph (i.e., length and width).	Defined in Chapter 3	√	Jason Griffith
24.	37	Floodplain. A couple of references would be nice in this section. My suggestions- Sommer et. al. (2001) at the end of the first sentence, Wissmar and Timm (2003) at the end of the paragraph.	Text revised	√	Jason Griffith
25.	38	Floodplain. End of 1st paragraph: Perhaps another reference?? Regetz (2003) is a good one.	Text revised	√	Jason Griffith
26.	38	Floodplain. 2nd paragraph, line 3: Sentence starts with Bank Stabilization practices, this should be changed to “Flood Control” practices.	Text revised	√	Bill Blake
27.	40	Sediment – Current Conditions. In the paragraph beginning “Efforts are underway...”, add that harvest and road building on unstable slopes is regulated by HCP as of 1997 and Forest and Fish Rules; name the two landslides, or at least say where	Text revised	√	Stacie Watne, DNR

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		they are in the watershed and what caused the recent failures of concern; reword the last sentence in this paragraph to something like "As a result, the Stillaguamish Flood Control District is frequently dealing with maintenance issues from the amount of fine sediment in the system."			
28.	40	Sediment – Current Conditions. Paragraph 2, line 4: Maybe change the sentence to read something like, "The slides' impacts extend downstream to the estuary, EDT modeling has singled out sediment as one of the main limiting factors affecting Chinook in the Stillaguamish.	Text revised	√	Jason Griffith
29.	40	Sediment – Current Conditions. Table 5: I think the column heading "% of all roads that are unstable" is misleading. Nobody has actually gone out to survey these roads to see if they are indeed failing. Perhaps a better title would be "% of roads at risk"	Table revised	√	Jason Griffith
30.	40	Sediment – Current Conditions. Footnote 9: The stability of individual soils/sites do not only concern slope percent, but also substrate, perched water table, soil composition, historical use and other factors. It is incorrect to state that slopes over 15% should be considered unstable. According to the Forest Practices Board Manual, Section 16, certain landforms are can be unstable at percents of 70%+. When forestry activities, including harvest or road building, will occur on or near these types of features, a Class 4-special forest practices application is necessary, initiating additional scrutiny under the SEPA process, which includes an on-site Interdisciplinary Team visit.  Abandoned roads typically have all road crossings removed, so they do not have sections with culverts remaining. Culverts can be left on orphaned roads, but these two types of roads are completely different.	Comment noted	√	Stacie Watne, DNR
31.	42	Hydrology. Suggestion for additional figure: Although I'm biased, I think it would be good to add a Figure 6 that depicted Chinook survival as is it relates to flow (from some unpublished smolt trap data here at the Tribe).	2 figures added from Beamer and Pess 1999	√	Jason Griffith
32.	42	Hydrology – Historical Conditions. Suggest changing sentence to end with "have been shown to increase the magnitude and severity of peak flows (Wissmar and Timm 2003)."	Text revised	√	Jason Griffith

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33.	42	Hydrology – Factors of Decline. Line 15: Differentiate between deforestation and forest management. Deforestation only occurs when a forested area has been cleared and converted to another land use. Lands managed for forestry have to be replanted. Maybe say something like "Deforestation. Clearing of mature forest vegetation and conversion of these lands to other land uses that do not support forest cover."  Industrial Forestry. This land use may not support large blocks of hydrologically mature forest cover on a sub-basin scale and may contain forest stands ranging in age from seedling to mature.	Text revised	√	Stacie Watne, DNR
34.	43	Hydrology – Current Conditions. Below Table 6: Explain how peak flow and low flow are connected and why they are being dealt with in the same section.	See first paragraph of section	√	Stacie Watne, DNR
35.	45	Water Quality. 1st paragraph, line 3: Says effects of fish "of" chemical, should say "from"	Text revised	√	Bill Blake
36.	45	Water Quality. 1st paragraph, end of line 3: Suggest adding a reference - Baldwin et. al. 2003.	Text revised	√	Jason Griffith
37.	50	Harvest. Paragraph 1, line 9: Suggest adding ", and annually encounter Chinook bearing scars from unsuccessful poaching incidents" at the end of the sentence.	Text revised	√	Jason Griffith
38.	51	Estuarine/Ocean Productivity Conditions. Suggest adding a reference to replace STAG 2000- Mantua et. al. 1997 is much better.	Text revised	√	Jason Griffith
39.	52	Predation on Chinook Salmon. I believe background and on going population numbers over time should be established and monitored for California sea lions & harbor seals in Port Susan and South Skagit Bay particularly during the period of mature salmon return migration into the mouth of the Stillaguamish River. A table of this information should be provided concurrent with other monitoring data tracking Chinook recovery progress. In addition a study should be conducted, unless data already exists, establishing the daily consumption of mature Chinook Salmon each of these marine mammalian species	Text revised; Stillaguamish brood stock program shows no significant evidence of	√	Duane Weston

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		cause per unit on average at return migration time. Justification for this information is to measure the impact marine predation may have on Chinook Salmon recovery. If the population of these two seal species increases at a faster rate than returning Chinook spawners, the back ground data could be invaluable in addressing recovery problems attributed to predation.	predation by sea lions and seals		
40.	52	Predation on Chinook Salmon. End of paragraph: Add new sentence - "There is insufficient data to gauge the magnitude of the bird and mammalian predation on Stillaguamish salmon populations, however it is not likely worse than under historical conditions (NMFS website, Ruggerone and Goetz 2004)."	Text revised	√	Jason Griffith
41.	52	Non-Native Species. Add alterniflora after Spartina, delete "Chinook salmon life histories" and replace with "estuarine habitat". A reference is needed here, although I didn't find one quickly.	Text revised	√	Jason Griffith
42.	52	Climatic Shifts. Replace "STAG 2000" with "CIG 2004"- a much better reference.	Text revised	√	Jason Griffith
43.	60	Properly Functioning Conditions – Riparian. Line 1: This section states that to achieve PFC, a riparian buffer of greater than 1 site potential tree height (SPTH) is necessary. However, the DNR State Lands HCP considers 1 SPTH to meet protection requirements.	Text revised	√	Stacie Watne, DNR
44.	60	Properly Functioning Conditions – Riparian. Footnote 14: Generalizing the Site Potential Tree Height for the entire watershed as over 200 feet is incorrect. This depends on site-specific soil types and site class, which is a measure of productivity. This varies tremendously within the watershed, to Site Class 1 soils which have a 200' SPTH buffer in the lower reaches of the watershed, to Site Class 4 soils which get a 110' SPTH buffer in the upper reaches. See Forest Practices Rules, Chapter 222-16, page 16-12 for more information.	200' SPTH applies to most riparian areas within Chinook anadromous zone	√	Stacie Watne, DNR
45.	60	Properly Functioning Conditions – Large Woody Debris. I would suggest moving the definition of LWD to the front of this paragraph.	Text revised	√	Jason Griffith

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46.	61	<p>Properly Functioning Conditions – Sediment. Mention other sediment sources in the watershed, such as bank erosion due to cleared riparian areas, impacts from farming right up to riverbank, development etc. Undoubtedly, the only source of sediment in this watershed isn't forest roads.</p> <p>Line 23. Under Sediment section, in the sentence beginning with "The 2004 Stillaguamish...", How many of those 124 miles of road have been abandoned? Did anyone check to see if there are any RMAP plans for any of those road miles? What unstable criteria was used to determine that these roads are on potentially unstable landforms? Was it Forest Practices Board Manual criteria?</p>	Comments noted. RMAP not included in analysis for this plan.	√	Stacie Watne, DNR
47.	61	<p>Properly Functioning Conditions – Hydrology. Maybe mention hydrological impacts from loss of wetland function, bank armoring, channelization etc. in the lower watershed along with forest cover loss. Again, forestry is not the only impact on hydrology in the basin.</p> <p>Maintaining 80% mature forest cover is not a realistic expectation, especially when it would be impossible to regulate on private land. The DNR State Lands HCP requires 2/3 of the sub-basin that is in the Rain on Snow Zone be in hydrologically mature forest (forests at least 25 years old). Requiring 80% cover would mean a 100 year rotation, which is not economically viable.</p> <p>Reword the last sentence in the Hydrology section to something like "This assumption may be overly conservative given current land use pressures and the fact that maintaining this amount of forest cover would preclude the economic viability of forestry as an industry in this watershed."</p>	Text revised	√	Stacie Watne, DNR
48.	80	Approved Riparian Projects. I think it is great to name those doing riparian work but unfortunately stakeholders like the task force and flood control district and others have been left out. Maybe it should state "SIRC Stakeholders" and avoid specifics.	Text revised	√	Bill Blake
49.	81	Approved Estuary/Nearshore Projects. I'm not sure that I follow the reasoning for the proposal to create salt marsh by placing engineered logjams on the tideflats. I understand that logjams were historically abundant in the lower Stillaguamish, and that logjams promote habitat complexity in river channels. But evidence from Collins (1997) seems to suggest that the lowest channel-spanning logjam occurred at the confluence of	Pilot project to be monitored by adaptive mgmt.	√	Danelle Heatwole, TNC

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		the Old Mainstem and Hatt Slough, whereas snags were more common downstream of the confluence. Also, the functions of wood in the estuary/nearshore have yet to be effectively documented, and it may be inappropriate to assume that wood has similar functions in all aquatic environments (Simenstad et al. 2003). Perhaps a strong case for the project isn't needed in the recovery plan, but the case that seems to be presented is a bit confusing. For example, on page 34, the lack of distributary channels is listed as a limiting factor, and then on page 80, the project of constructing logjams to enhance tidal channel formation in the river delta appears to address this limiting factor. Then on page 81, we're suddenly attempting to create 120 acres of salt marsh on the existing tideflats using logjams. (I see that this project was commented on in the previous draft, and that it's being considered experimental. Please see my comments below for page 121.)			
50.	81	Potential Estuary / Nearshore Projects: This section seems to encourage all pocket estuary restoration energy to go to WRIA 6 and WRIA 7 areas. To me, it seems like there should be some encouragement to aggressively pursue what pocket estuary restoration opportunities there are in WRIA 5 as well as working in WRIA 6 and WRIA 7. I say this because you may exceed the capacity of the WRIA 6 and WRIA 7 historic pocket estuaries to meet the needs of a whole other basin. Potentially, overall return of chinook to all three WRIAs may be reduced.	Text revised	√	Chrys Bertolotto, WSU Coop Ext.
51.	81	Potential Estuary / Nearshore Projects. I will reiterate that we NEED to include specific projects and/or locations in around Port Susan. Stillaguamish Chinook use Island Co nearshore.	Text revised	√	Jason Griffith
52.	84	Approved Floodplain Projects. Bottom paragraph: I don't agree - there is only one type of bank protection that does not harm Chinook-WOOD! Anything involving large amounts of rock is habitat degradation under the guise of "bank protection". There is an excellent paper by Beamer on bank armoring and fish use.	Text revised	√	Jason Griffith
53.	87	Table 9 - 10-Year Habitat Project Costs. The acres of estuary restored (195) seems a little low, considering the TNC property alone is 160 acres. Certainly, all 160 acres may not be restored to tidal inundation, but it seems like more than 60 acres may be (assuming 133 restored on Leque Island). Or do you mean 195 acres of <b>salt marsh</b> will be restored?	195 acres of salt marsh (80 at TNC, 115 at Leque)	√	Danelle Heatwole, TNC

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54.	97	Long-Term Habitat Restoration Projects. In the first sentence “ reaching the 30% PFC and Chinook Salmon population target” assumes other limiting factors such as natural oceanographic conditions, harvest at sea and natural predation levels stay at predictable levels.	Text revised	√	Duane Weston
55.	98	Table 11 - Habitat project costs, years 11-50. The acres of estuary restored and created (2500 and 805, respectively) don't seem to reflect the new PFC of 2020 acres estuary restored.	Table revised	√	Danelle Heatwole, TNC
56.	99	Existing Habitat Protection Actions. Both Arlington and Stanwood are updating their GMA Comprehensive plan, same as the counties. I also know that the “Land Use Codes” include regulations that control impervious surface and other parameters related to hydrology and sediment. We should probably list “Land Use Codes” for all both county's and cities. Department of Ecology has jurisdiction over Wetlands.	Text revised	√	Bill Blake
57.	99	Existing Habitat Protection Actions. Clarify that the DNR HCP is only for state managed lands and add Forest and Fish Rules for private forestry.	Text revised	√	Stacie Watne, DNR
58.	100	Existing Habitat Protection Actions. Being that this table has been changed it does not support the intended message. But if you choose to use it in its altered state the following categories need to be checked per jurisdiction to be correct. Arlington: check Riparian, Sediment and Hydrology. Stanwood: check Estuary. SnoCo: check Riparian and Hydrology. DOE: check Estuary and floodplain. WDFW: remove Riparian and Floodplain and Sediment. DNR: check Floodplain. USFS: no change	Table revised	√	Bill Blake
59.	100	Habitat Protection Tools. Paragraph 1, line 6: replace “that” with “which, in turn,”	Text revised	√	Jason Griffith
60.	102	Incentives and Non-Regulatory Approaches. 2 <sup>nd</sup> bullet: Snohomish County and the City of Arlington have a TDR program. There is no TDR program if Arlington doesn't participate. Either drop that sentence or add Arlington.	Text revised	√	Bill Blake
61.	104	Land Use Recommendations – Rural Residential and Urban Land Use. 2 <sup>nd</sup> paragraph: “These activities contribute to reduced natural infiltration and increased stormwater runoff.” Should add after reduced natural infiltration “and evapotranspiration”.	Text revised	√	Bill Blake
62.	105	Land Use Recommendations – Rural Residential and Urban Land Use. 1 <sup>st</sup> bullet: This needs to say: Avoid expansion of Urban Growth Area Boundaries adjacent to critical	Text revised	√	Bill Blake

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		Chinook habitat areas. I would guess neither the City or County Council will not pledge commitment to a plan stating "limit expansion of UGA's"			
63.	105	Land Use Recommendations – Roads and Utilities. Last bullet: Should say "prevent" new barriers, not avoid	Text revised	√	Bill Blake
64.	106	Regulatory and Programmatic Actions – Riparian. 3 <sup>rd</sup> bullet: Many stakeholders have other approved plans for buffer widths. This bullet should end with "when local regulations are not available."	Text revised	√	Bill Blake
65.	106	Regulatory and Programmatic Actions – Large Woody Debris. 1 <sup>st</sup> bullet: Drop the end of sentence that says "except when posing an immediate threat to public safety or essential facilities." This is already in the critical areas regulations and logically allowed, but we don't need to encourage it.	Text revised	√	Bill Blake
66.	106	Regulatory and Programmatic Actions – Large Woody Debris. last bullet: Strike this sentence; every agency already has people doing that job. We don't need to create a new bureaucratic program for something we can already do in our sleep.	Text revised	√	Bill Blake
67.	106	Regulatory and Programmatic Actions – Floodplain. 2 <sup>nd</sup> bullet: Change "Designate" to "Identify". Then I also have a question: where is a citation that says CMZ's are "geologically hazardous"? I don't get it? I would just drop the geo haz from the sentence.	Text revised	√	Bill Blake
68.	107	Regulatory and Programmatic Actions – Floodplain. 3 <sup>rd</sup> bullet: Drop "such as in urban areas". There is no difference between rural and urban "development" when it comes to a floodplain.	Text revised	√	Bill Blake
69.	107	Regulatory and Programmatic Actions – Floodplain. 4 <sup>th</sup> bullet: Replace "natural channel condition" with "floodplain processes"	Text revised	√	Bill Blake
70.	107	Regulatory and Programmatic Actions – Floodplain. 8 <sup>th</sup> bullet: Move "with equivalent mitigation" after "shorelines."	Text revised	√	Bill Blake
71.	108	Regulatory and Programmatic Actions – Sediment. New bullet: Develop seasonal rules that reduce risk during high precipitation periods	Text revised	√	Bill Blake

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72.	108	Regulatory and Programmatic Actions – Hydrology. New bullet: Protect and restore wetlands.	Text revised	√	Bill Blake
73.	108	Regulatory and Programmatic Actions – Water Quality. New bullet: Protect and restore wetlands.	Text revised	√	Bill Blake
74.	108	Regulatory and Programmatic Actions – Water Quality. 3 <sup>rd</sup> bullet: Add NPDES after TMDL.	Text revised	√	Bill Blake
75.	108	Regulatory and Programmatic Actions – Noxious Weeds. 2 <sup>nd</sup> bullet: Develop a process that assures land management activities and restoration projects include a noxious weed <b>control</b> component	Text revised	√	Sonny Gohrman
76.	109	Compliance and Enforcement. Line 2: Change “implementation” to “enforcement”	Text revised	√	Bill Blake
77.	109	Compliance and Enforcement. 1 <sup>st</sup> bullet: Change “permit review” to “ongoing code compliance”	Text revised	√	Bill Blake
78.		Compliance and Enforcement. 4 <sup>th</sup> bullet: I think everybody already has mechanisms to support violation. I would start sentence “A 24-hour phone line.....”	Text revised	√	Bill Blake
79.	109	Compliance and Enforcement. Some of the recommended bullet items are probably not feasible because in reality they cause other problems. Bullet 4 is an invitation to harassment by disgruntled individuals who are out to get even for something totally irrelevant. Forest land owners have experienced this negative behavior with normal everyday forest practices in the past. If frequent unfounded complaints were to result from establishing this bullet, private forest land owners would likely close their lands to public entry. This bullet is not in the best interest of recreational users. Snohomish County government would not like the last bullet. Ask any rural land owner how lax Snohomish County is at enforcing illegal dumping and other pollution ordinances, even on a river bank.	Text revised	√	Duane Weston
80.	109	Compliance and Enforcement. The statements in the fourth and seventh bullets are contradictory; either establish a complaint process or an adaptive management process. Can do both if it is not worded that instead of complaints, adaptive management will	Text revised	√	Stacie Watne, DNR

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81.	111	Stewardship Education and Outreach – Introduction: Line 16: Add “achieves the following:” to the end of the sentence.	Text revised	√	Stacie Watne, DNR
82.	112	Stewardship Approach. 2 <sup>nd</sup> paragraph: Strike the entire paragraph as this has nothing to do with Chinook recovery. Maybe just keep: “Direct personal contact has a higher per capita cost, but the measurable results in terms of salmon habitat protection and restoration are much greater (citation).”	Text revised; comments noted	√	Bill Blake
83.	112	Public Education and Outreach Goals. #6: Replace “infrastructure” with “strategy”. Too may stakeholders to have a single infrastructure.	Text revised	√	Bill Blake
84.	113	Stewardship Audiences. Add rural residential residents to the list of stakeholder groups regardless if they have streamside property or not. They can still have impacts through pesticide and fertilizer application, livestock operations, etc.	Text revised	√	Stacie Watne, DNR
85.	114	Stewardship Audiences. 2 <sup>nd</sup> paragraph, line 5: After “person-to-person contacts” add “and compromise.”	Text revised	√	Bill Blake
86.	114	Stewardship Audiences. 3 <sup>rd</sup> paragraph, line 3: Should say quality “and quantity” of water	Text revised	√	Bill Blake
87.	114	Stewardship Education and Outreach Topics. Last paragraph: change “Promoting public awareness of these topics...” to “Promoting public knowledge of these topics...” or something like that. Awareness connotes a passive understanding of a situation. Knowledge is something deeper and potentially more active.	Text revised	√	Chrys Bertolotto, WSU Coop Ext.
88.	115	Stewardship Education and Outreach Topics. Along the same lines, the list of topics doesn't touch on the idea of building the “stewardship-making skills” of the population. Person to person contact is excellent, and even more powerful when it is a neighbor rather than affiliated organization representative making the contact. A possible inclusion could look like this: “Educational, Resource Protection and Community Involvement Techniques: Once community members become aware of noted topics, they may want to work locally with their neighbors to make changes for salmon recovery.	Comment noted	√	Chrys Bertolotto, WSU Coop Ext.

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		By teaching interested community members proven techniques to act as citizen educators, scientists and program organizers.”			
89.	115	Stewardship Education and Outreach Topics – Function of Shoreline...: I think it is a little impractical to expect or educators to provide clear explanations of how habitat functions benefit “all organisms”. This sentence should stop after “landscape level.”	Text revised	√	Bill Blake
90.	115	Stewardship Education and Outreach Topics – Salmon Ecology and Habitat Requirements: including historic conditions as part of that discussion would be valuable in helping individuals understand that what they have known since childhood is not how it has 'always' been.	Text revised	√	Franchesca Perez
91.	115	Stewardship Education and Outreach Topics – Water Quality Issues: Currently says “fresh water quality”, should say “stream” water quality. Also “water toxins” should be covered under water quality above. This is a technical document, terms like “seemingly innocuous” should be stricken.	Text revised	√	Bill Blake
92.	116	Stewardship Education and Outreach Topics – Policy Affecting Landowners: Add a word-“providers should therefore be able to offer <b>contact</b> information on policies..” This is necessary with multiple regulatory bodies, you need to get the applicant to the correct regulator.	Text revised	√	Bill Blake
93.	116	Stewardship Activities. 3 <sup>rd</sup> paragraph, lines 1-4: I recommend adding “horse clubs, Farm bureau and forest owners. The current list would just be preaching to the choir.	Comment noted	√	Bill Blake
94.	117	Stewardship Activities. Top of page, line 1: Add after “residents” – “to access funding and...”	Text revised	√	Bill Blake
95.	117	Stewardship Activities. Itemized list of valuable activities: One educational element is missing from this list: Building community stewardship activities and leadership. Could sound something like this - "Provide advanced educational opportunities to build knowledge base and skills of interested community to act as stewards on behalf of salmon recovery through their own educational or programmatic initiatives."	Text revised	√	Chrys Bertolotto, WSU Coop Ext.
96.	117	Stewardship Activities. There is a noticeable absence of marine shore landowner activities, such as creating signage for and educating about valuable habitat like eelgrass meadows, salt marshes, pocket estuaries, or forage fish beaches; and hosting workshops for derelict fishing gear reporting and prevention, bulkhead alternatives, etc.	Text revised	√	Franchesca Perez

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		It would be appropriate to include marine shore activities, since estuary and nearshore are included in the restoration strategy.			
97.	118	Stewardship Activities. #9: Add LWD, Bio-engineering	Text revised	√	Bill Blake
98.	118	Stewardship Activities. #15: Strike this. There is already a festival and there are already bullets identifying the creation of pamphlets.	Text revised	√	Bill Blake
99.	118	Funding for Stewardship. This reads like there aren't any programs with base funding, which is incorrect. This should reflect "those existing programs with base funding are more successful implementing long-term strategies.	Text revised	√	Bill Blake
100.	119	Monitoring and Adaptive Management - Introduction and Purpose. 3rd paragraph: The ideas in this paragraph are not presented very clearly. The sentences are a bit long and contain too many different concepts. For sentence #2, how about "Monitoring is a critical element of the recovery effort and will include systematic, measurable observation..." Perhaps have "as distinguished from other, more familiar types of monitoring..." in its own sentence. As for the purpose of recovery plan monitoring, I don't understand what "to indicate monitoring of specific plan commitments, targets, and expected responses" means. Do you want to <b>evaluate progress towards</b> specific plan commitments, targets, and expected responses?  4th paragraph, 1st sentence: I'm not sure what you mean by "which affects capacity." If we want to increase productivity and abundance of Chinook salmon, wouldn't that be affected more by habitat capacity, rather than vice versa?	Text revised	√	Danelle Heatwole, TNC
101.	119	Monitoring and Adaptive Management. My comment for page 52 should apply in this Chapter. There should be a predation species monitoring plan. I don't know what to suggest for an action procedure if marine mammal predation is found in time to be a minimizing factor towards Chinook recovery, but at least the monitoring should take place so population trends can be understood.	Identified as research need for co-managers/ federal agencies	√	Duane Weston

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102.	120	Monitoring and Adaptive Management – Introduction and Purpose. Add a last paragraph, this is important. I already requested this be in this section and it is not. I will recommend Arlington and other stakeholders not commit to the plan if this is not included: The SIRC recognizes that many stakeholders have their own methods of monitoring the progress of their restoration activities. Stakeholders have already established baseline conditions by methods such as the NOAA Fisheries Matrix of Pathways and Indicators and other scientifically acceptable and affordable methods. The SIRC will still continue to support a stakeholders ability to submit their monitoring results in any method they choose realizing that there may be a comparison of their methods to this Monitoring and Adaptive Management plan. All Stakeholders should retain the right to utilize any methods that have already been adopted through an approved regulatory process.	Text revised	√	Bill Blake
103.	120	Monitorable Plan Elements. 1st paragraph: You might need some improved terminology here. What are “monitoring plan elements?” Advantage should be taken of standard methods and techniques for measuring what? Perhaps the “attributes being measured” should be unambiguous rather than the “comparisons and triggers?”	Text revised	√	Danelle Heatwole, TNC
104.	120	Monitorable Plan Elements – Habitat Restoration. Projects Implemented: Are these examples or a complete list? If the latter, then a few components of Table 9 didn’t make it over.	Text revised	√	Danelle Heatwole, TNC
105.	120	Monitorable Plan Elements – Habitat Restoration. Projects Implemented: Consider adding noxious weeds to your list of measurable. Noxious weed control is a measurable activity. It can be measured in acres or the number of sites controlled.	Text revised; Identified as research need	√	Sonny Gohrman
106.	120	Monitorable Plan Elements – Habitat Restoration. Project Effectiveness: Is the bank protected...by riparian vegetation? Not really clear what you mean by this. Also, what about monitoring the effectiveness of restored habitats in providing the opportunity and capacity to support salmon?	Text revised	√	Danelle Heatwole, TNC
107.	121	Monitorable Plan Elements – Habitat Restoration. Validation of Assumptions: Given that the 10 engineered logjams in the estuary are considered experimental, and that the project is based on the assumption that logjams will function a particular way, it might be good to validate those assumptions here. Also include as another row in Table 21.	Text revised	√	Danelle Heatwole, TNC

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108.	121	Monitorable Plan Elements – Habitat Protection. Line 16: Add acres of riparian management zones, wetland management zones or acres taken from timber sales due to slope instability on state lands.	Comment noted. Using land cover analysis for sub-basin scale monitoring	√	Stacie Watne, DNR
109.	121	Monitorable Plan Elements – Harvest Plan. Does this need to be fleshed out??? Seems a little light on explanation of the various bullets.	Text revised	√	Jason Griffith
110.	122	Table 13 - Habitat Restoration Implementation Monitoring. Row 4: What does it mean to treat or restore roads on erodible geology? Can this include road abandonment? Might want to define this to so the appropriate agencies understand the expectations.	No, restoration does not include road abandonment.	√	Stacie Watne, DNR
111.	122	Table 13. Habitat Restoration Implementation Monitoring. Leque Island – do we care about acres of salt marsh restored? TNC Property – do you mean 80 acres of <b>salt marsh</b> restored? Port Susan delta logjams – the goal of “10 logjams installed” doesn’t sound very experimental anymore. Will there be an evaluation of whether one works before installing all ten?	Text revised	√	Danelle Heatwole, TNC
112.	125	Table 17. Habitat Restoration Effectiveness Monitoring. Leque Island and TNC property – I’m not sure that acres restored will really tell you whether the restoration has been effective. What if the acres are a Spartina meadow? They’d still technically be restored to “estuary”. Better metrics might be those that indicate whether the restored habitats are providing the capacity, opportunity, and realized functions to support salmon populations—things like the composition and density of emergent plants, benthic invertebrates, and estuarine fishes, and like the stomach contents of juvenile salmon using the habitats. Delta logjams – The tideflats are already “estuary”. Change to “acres of <b>salt marsh</b> created.”	Text revised	√	Danelle Heatwole, TNC

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113.	128	Table 22, row 2. Add Forest and Fish Rules to riparian protection measures.	Text revised	√	Stacie Watne, DNR
114.	130	Administration. Table 24: Instead of the column title "Funded By" I think "Lead Agency" might be a little more accurate. We don't have the money to do all the monitoring in the Table for the next 10 years! We take each year at a time, as I'm sure many agencies do.	Text revised	√	Jason Griffith
115.	133	Stakeholders for Implementation. I'm still wondering about listing out different county entities separately. It seems like each one has a different responsibility in this endeavor so it seems like each commitment would be specific to their responsibilities. If a general county letter is sufficient that is certainly easier. Just a thought.	Comment noted	√	Sonny Gohrman
116.	135	Land Use Regulations. 2 <sup>nd</sup> paragraph, line 5: I don't know where "nominal" came from. Arlington alone is planning of doubling from 15,000 up to 30,000 in the next ten years. Strike this unless you have data to support it.	Text revised	√	Bill Blake
117.	136	Policy and Regulatory Issues - Forest Practices. Why is there uncertainty regarding implementation of forestry regulations that affect fish habitat? State lands has been under HCP management since 1997, private forestry has been under Forest Practice regulation for several decades with recent updates, and Forest Service has been managing under the NW Forest Plan since the early 1990's. In the broad sense, these changes are relatively recent and positive effects may not yet be seen, but expecting forest practices that conflict with any of these policies is unreasonable, especially given the fact that many have been negotiated at the state and federal level and their credibility as such should be recognized.	Text revised	√	Stacie Watne, DNR
118.	136	Forest Practices. 4 <sup>th</sup> bullet: Where did 80% come from? Is that riparian? Our number is that a sub-basin total of immature forest be maintained below 12%. Booth states that 65% has to remain in forested condition. I think you better just stick with the <12% approved by the TAG and SIRC.	Text revised per Nichols et al. 1990	√	Bill Blake
119.	137	Forest Practices. The Stillaguamish Watershed Chinook Salmon Recovery Plan does not recognize the tremendous changes Forest & Fish regulations are making on the landscape. What occurred prior to Forest & Fish regulations is history that will take time to heal. Forcing additional restrictions onto forest landowners before the results of current rules can be measured is not justified or fair. Having the County General Policy	Text revised; County jurisdiction is limited by existing	√	Duane Weston

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		plan address forest practices on anything but lands being converted out of resource use is unacceptable. If forest practices under Forest & Fish regulations are not acceptable to SIRC, then SIRC needs to encourage creation of financial incentives that will enable forest landowners to participate. Forcing wider riparian buffers and longer rotations without adequate compensation will destroy commercial and small private forest land ownership in the Watershed.	forest practices regulations		
120.	139	Instream Flows. 2 <sup>nd</sup> paragraph: Our DOE wetlands work showed the Pilchuck hydrology has also been altered by wetland loss. Was wetland loss included in the modeling?			Bill Blake
121.	146	Floodplains. 3 <sup>rd</sup> paragraph, last sentence: I had this sentence phrased differently and placed it in the initial paragraph of this section. I want it to go back to the front. It is the critical part of this section, far beyond the flood plan. I am implementing the consensus of the SIRC membership to protect Ag at this time to secure the future restoration of floodplain function.	Text revised	√	Bill Blake
122.	147	Floodplains. 1 <sup>st</sup> paragraph, line 10: Replace "an" with "a"	Text revised	√	Bill Blake
123.	147	Floodplains. 2 <sup>nd</sup> paragraph, line 1: Put "from" in front of "1930"	Text revised	√	Bill Blake
124.	148	Long-Term Planning Issues – Forestry. Line 36: Change the sentence that begins "The SIRC recognizes...", to "The SRIC recognizes the longevity of timber production, coupled with market and regulatory uncertainty, adversely impacts the economic viability of forest land ownership and that conversion to urban development may result. Then add the sentence from the Agriculture section on page 146, line 2, "The permanence of change resulting from this type of land use conversion has significant long term impacts that conflict with the goals of salmon recovery and ecosystem restoration."	Text revised	√	Stacie Watne, DNR
125.	148	Forestry. Considerable sensitivity is shown by SIRC on Pages 145-6 about wanting to find incentives for Agriculture to participate in Chinook salmon habitat restoration and protection. I suggest that SIRC recommend a financial analysis be conducted to explore what incentives are necessary for forest land owners to participate further beyond the requirements of Forest and Fish regulations. Establishing incentives is a meaningless phrase without knowing the magnitude of what will be required.	Text revised	√	Duane Weston

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126.	149	Add a closing: It needs to be recognized that for all the goals identified in this plan to be met it will truly be up to the people living in the Stillaguamish watershed over the next 100 years. All the SIRC can do with this plan is make recommendations for actions that will provide the stewards of the future a chance to benefit from our vision.	Text revised	√	Bill Blake