Comment on Environmental Assessment (EA) for the Dosewallips Engineered Log Jam Project by John Woolley – May 15, 2012

OFCO supports efforts to restore aquatic quality and the addition of large woody debris (LWD) to the rivers on the Olympic Peninsula. Protection and restoration of our forest lands and aquatic systems has been OFCO's mission since its inception. But the best of intentions must be implemented with wisdom, including a fully funded monitoring and analysis process.

After decades of illogically removing large logs and root wads from the Dosewallips, we must do whatever is reasonable to promote the restoration of remnant wild Chinook populations. Seemingly, biologists overwhelmingly support trying to correct our mistakes. Still, OFCO has concerns regarding engineering log islands in the middle of the river:

- After the proposed implementation of manmade structures in the river, the Dosewallips will be in turmoil for years, as it adjusts to redirection of its flow.
- Collateral damage is unavoidable, and disruption to recovering steelhead populations is of concern. This issue has yet to be addressed completely. Collateral damage is unavoidable, and disruption to recovering steelhead populations is of concern. This issue has yet to be addressed completely.
- Biologists are not hydrologists, nor geologists. OFCO is uncomfortable with the lack of a full science team in the development of the draft EA.

Two credible sources do not support the construction of ELJs in the Dose's upper reach. These sources claim that ample LWD can be generated naturally, making it unnecessary to degrade the river in the short run, hoping to make it better in the long run.

Is there even a wild stock of Chinook? Are the numbers sufficient to utilize the results of our proposed massive intrusion into the Dosewallips' natural efforts to stabilize?

Skepticism is a valid point of view, especially considering the history of these projects. Monitoring must be included. This means funding a clear program that allows us to analyze the results of our efforts. Unintended consequences are as common as not. The engineers of these projects need to be able to study and compare the consequences of their efforts. The public is at a disadvantage until the results of LWD projects are made transparent.