Type F West Side Tribal Recommendations
12/20/13

RULES

West side Tribal Caucus thoughts: The current interim rule suffers from implementation issues, but the rule itself is adequate for the most part.

West side Tribal Caucus recommendations:

1. Make minimal changes to the current rule to change it to permanent, clean up any discrepancies in order to eliminate use of the map as rule, and any other related language changes needed.
2. No changes to fish habitat definitions are recommended.
3. Rule change is recommended to eliminate downgrading streams that have been field surveyed and determined to have fish. Once a stream is verified to have fish, there should be no further effort to determine fish presence or absence. This is stated in the FFR, and in DNR Q/A document, but not in rule yet. It is needed in the rule so that it is clearly required.
4. DNR - Revisit the water type improvement project of 2010. Some changes were made, but implementation has been spotty and has wavered in various DNR regions. Revisit with the stakeholders and coordinate the implementation so all DNR regions are carrying out WTM properly.

GUIDANCE

West side Tribal Caucus thoughts: Tribes have participated in many field reviews of water type situations that occur at multiple sites. The "Tech\Ops" memo captured many of these repetitive issues and proposed guidance for those issues. We are currently working these issues out on the ground, FPA by FPA, and have been able to come to agreement. This requires a lot of time and arguing that could be lessened if recommendations are captured in written guidance.

West side Tribal Caucus recommendations:

1. DNR lead a stakeholder group on revising Board Manual 13, "Guidelines for Determining Fish Use for Purposes of Water Typing". This can be done now according to current rules. Later rule changes can be incorporated into the manual at the time of rule adoption.
   a. Provide guidance on the items in the "Tech/ops" memo.
   b. Clarify off-channel habitat within the current rules.
   c. This work would eliminate the need for the "Lenny memo".
2. Take the completed proposed Board Manual to the Forest Practices Board for adoption.

WATER TYE MAP & MODEL

West side Tribal Caucus thoughts: The tribes have no confidence in re-running the geomorphic model, whether with DEM's or LiDAR-based elevation models, because the cost is high, and the product is not likely to be of the quality desired. At most a LiDAR-based model would produce a better screening tool, due to better modeling of the hydrography. Also, DNR does not have the resources to support the map with field review on the non-forest areas or updating those water types on the map, but these non-

forest areas are critical to endangered species. The water typing maps need to reside with an agency that covers all land uses, and has personnel to support the GIS layer and provide field implementation assistance to all types of land uses.

West side Tribal Caucus recommendations:

1. Report to the Board on inaccuracies of water typing system – assign a technical team or find volunteers
2. Ask DNR to investigate what it would take to acquire state-wide coverage of LiDAR which can be used to better model the hydrography than the 10-meter DEM's (LiDAR is also a very important tool needed for use in screening for unstable slopes) Collaborate with other agencies, counties/cities, Puget Sound Partnership, University of Washington, etc. The LiDAR would be used as a screening tool.
3. Consider moving the water typing administration to the Department of Ecology because the same maps are used by all land uses – forestry, cities, counties, etc. Provide for either Ecology or DNR or a blend of agency responsibilities that will adequately support water typing maps and field implementation on all land uses.

ELECTROFISHING

West side Tribal Caucus thoughts: The tribes believe that they understand the effects on fish populations of proper use of electro-fishing for water typing purposes, and believe it is a useful tool whose gains outweigh the impacts of using it, when used properly.

West side Tribal Caucus recommendations:

1. In order to get everyone to the same level of understanding, and to agree on proper use of electro-fishing in protocol surveys, the tribes ask the Board to appoint a technical group to investigate the recent research in the field, and bring a recommendation on proper use of electro-fishing and the effects of such use to FFR Policy and the Board.
2. Ask DNR/DFW to determine the extent of electro-fishing statewide to date and report to FFR Policy and the Board.
3. We recommend that all fish detected (not just last fish detected) be included in the Water Type Modification (WTMs), and that this data be entered into a database. This way, the impacts on fish from electro-fishing will be more than an ephemeral process, but will provide valuable, long-term information, better justifying the use of electro-fishing.
4. FFR Policy will develop a recommendation to the Board on use of electro-fishing.