March 24, 2024

Riparian Characteristics and Shade (RCS) Study Alternative Site Selection Criteria for Eastern Washington Sites Shared with the Adaptive Management Program Policy Committee

Background

Concerns have been raised by our Eastern Washington Tribal Government representatives on the CMER and TFW Policy Committees, concerns with which WDFW and Ecology Policy reps agree, regarding direct adverse impacts to fish and their habitats as a result of the buffer configurations included in the RCS study if they are applied on Type S/F or connected Np waters, including perpetuation of impacts downstream from Np streams used as study sites to receiving S/F waters.

Request

The submitters of this statement of concern request that the Policy Committee recommend to CMER, RSAG and the Project Team to revise the RCS Site Selection Criteria for Eastern Washington Sites as described below.

Limit potential RCS study sites in Eastern WA to the following:

1. **<u>Disconnected</u> Type Np streams where planned harvest is already permitted under current rules (including thinning and patch clearcuts for Np), but also meeting minimum Type F physicals locally as well as meeting the study design criteria in the ISPR-approved Study Design for BFW (5-25ft);**
2. **If not enough of those sites are available, <u>connected</u> Type Np that meet Type F physicals and with a BFW of 5-25ft can be used. These sites will need to be free of resident fish.**
3. **If not enough sites that meet options 1 and 2 are available, Type F streams can be used.**

While restricting RCS study sites to these scenarios might involve some added challenges in finding suitable sites, a recent analysis in connection with the ENREP study found somewhere between 15-20% of Eastern Washington Np streams are isolated, i.e., not directly connected via defined above-ground channels to Type S/F waters at the downstream end. These isolated Np streams that also meet Type F physicals should provide an adequate supply of potential study sites that are still located along actual streams, providing topography and vegetation more directly analogous to what is found along Type S/F waters than what would be present if we were using roads or other non-stream features as "stream surrogates" for the study.

Rationale

This approach will help minimize impacts to fish and their habitats as a result of this study. This will alleviate concerns enough for Eastern Washington Tribal Government to be comfortable with moving forward with the study. As stated above, it is likely possible to find enough disconnected streams to satisfy the needs of the study. Furthermore, this approach will not significantly lower the scope of inference as much as a "stream surrogate" would.

Submitted by the Eastern Washington Tribal Governments, WDFW, and Ecology Policy Committee representatives.