

Alternative Recommendation for Eastern Washington Spatial Analysis

The FPB is required as part of the rule-making process to consider the likely costs and benefits of proposed regulatory alternatives, including evaluation of a no-action alternative. Within the current water typing rule-making process, a robust and unbiased landscape-scale spatial analysis of PHB alternatives is necessary to support this evaluation. However, it is clear that there are currently a wide range of opinions and uncertainties regarding exactly how such a spatial analysis should be accomplished, including details of defining the no-action baseline, clarifying/measuring accuracy against the regulatory performance target, and determining which field data are most suitable for inclusion in this analysis.

Rather than screen selected survey data prior to conducting the analysis as was previously done, I recommend that the FPB and DNR consider an alternative approach that more fully leverages opportunities to evaluate and resolve these issues through incorporation of the full range of available field data already collected and summarized by CMER in E WA. Incorporation of all available CMER spatial and tabular data in watersheds where high quality LiDAR is available at the outset of the analysis will allow for greater flexibility to evaluate, inform, refine, and assess potential PHB alternatives, including evaluation of the implications a variety of potential influences on the analysis of fish habitat as we work through these issues.

Opportunities provided by this alternative approach include the evaluation of:

- Multiple regulatory baselines (e.g current rule vs current regulatory practice).
- Influence of man-made barriers
- Influence of transient barriers
- Influence of survey timing
- Potential biases introduced by data screening
- Reliability of surveyor estimates of fish habitat vs observed temporal patterns of fish habitat occupancy
- FHAM process for PHB identification across the full range of situations likely to be encountered
- Performance of new or revised PHB criteria to more accurately reflect patterns of fish habitat utilization

A watershed-scale sampling approach was identified in 2001 by ISAG, statisticians representing multiple TFW caucuses, and other CMER participants as the most efficient and effective way to collect representative data to inform the development of fish habitat metrics. Multiple CMER studies were completed within this watershed-scale sampling design. A similar and complimentary approach in the evaluation of PHB alternatives can be expected to cost less to complete and provide more useful information than DNR's prior point by point approach to analyzing PHB spatial information. This recommendation builds on those prior FPB research investments (including recent data screening work), providing opportunities for a more complete and robust evaluation of available data.

I ask that the FPB and DNR allow time for further discussion of this recommendation prior to initiating their PHB spatial analysis.

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