

## Western Washington Tribes AFF policy talking points

Forest Practices Board AFF workshop – June 27, 2022

### 1. Electro-Fishing

Alternative A4 7% will make electro-fishing unnecessary in those portions of the watershed that are most likely anadromous habitat.

The goal of the AFF is to ensure that streams which are likely anadromous, because of their location in the watersheds (**hydrologically connected, low gradient, no physical barriers**), are protected as fish habitat. The concern is that a water typing system that is fundamentally based on fish presence and absence can erroneously classify streams as non-fish habitat.

In these streams there is a lot of uncertainty whether lack of a fish observation in a single pass survey is really a conclusive indicator of whether the stream is non fish habitat.

Electro-shocking is **not reliable and not necessary** in these streams. Instead of electro-shocking to confirm fish absence in these hydrologically connected, low- gradient streams, surveyors would instead focus on identifying physical characteristics that define relevant habitat features, such as channel gradient and barriers.

Once upstream of the AFF, electro-shocking can be used to determine fish presence/absence.

### 2. Potential and Recoverable Habitat

Fish habitat in rule (WAC 222-16-010) means habitat, “which is used by fish at any life stage at any time of the year including **potential habitat likely to be used by fish**, which could be **recovered** by restoration or management and includes off-channel habitat.”

Because A4 7% is defined using habitat features (channel gradient, barriers), if implemented it can and will protect potential habitat that is currently not being utilized by salmon once the habitat is recovered by restoration or by recovering fish stocks.

Reasons why salmon may not be observed in low gradient, accessible streams:

- Seasonal and annual use
- downstream temporary or artificial barriers
- depleted fish populations
- protocol survey not properly followed

Current fish populations are depleted in Washington state – **we need to protect and grow salmon habitat in currently un-occupied streams in anticipation of salmon coming back to these streams.**

*Debbie said this is a stat that Rob Purser likes to share - Since before European settlements in Washington state to the 1980s, fish populations are estimated to have dropped 90%, and since the 1980s populations are estimated to have dropped an additional 90%.*

### 3. Risk and Uncertainty

A4 7% helps balance risk and uncertainty that is currently only one-sided.

Current water typing system and proposed Fish Habitat Assessment Methodology (FHAM) are **fundamentally a presence/absence system**. Under this system, fish presence means a stream is fish habitat, and fish absence is used to determine when a stream is no longer fish habitat.

Under this system, **most if not all the risk in water typing error is currently one-sided against fish.** A stream where fish are not observed may in fact be fish habitat, but that stream may get designated as non-fish habitat anyway. Conversely, observing a fish in a stream will not result in 'overprotecting' that stream.

A presence/absence water typing survey can be reliable in identifying fish habitat in the right situations, for example mountain foothill headwater systems where fish are already present.

In other situations there is more uncertainty whether fish a presence/absence system will correctly type a stream. Examples include:

- Small, low elevation tributaries that drain into large mainstem streams.
- Small streams that drain directly into saltwater.
- Extensions of stream reaches above the 'last' observed anadromous fish.
- Headwater systems with floodplains and wetland systems.
- Disturbed and altered systems.

Can't rely solely on SWIFD as a substitute for an AFF because it too is a fish-presence system.

**SWIFD is incomplete**, especially in landscapes with mixed, small parcel ownerships, often due to a lack of permission to access stream reaches. (This issue also affects protocol surveys in these landscapes by preventing full quarter mile protocol surveys to confirm the full extent of 'no fish.')

Having an AFF that relies on habitat features (channel gradient, barriers) and not presence/absence balances the risk and uncertainty of mis-typing streams in those portions of the watershed that are most likely salmon habitat. These streams are presumed anadromous habitat even if they are not currently being used by salmon and may need to be recovered or restored by management – e.g. by getting fish buffers.

#### **4. AFF Spatial Analysis**

We think the spatial analysis provided a good comparison of the performances of the different alternatives and showed that **all the A4 alternatives would be viable as definitions of an anadromous fish floor.**

We think now the AFF question is a policy decision, not a technical question.

We think many if not all the 'overshoots,' where the GIS model estimated the AFF to extent above the regulatory F/N break were the result of the model not identifying features that in the field, where the AFF is actually implemented, would be clearly identified as fish barriers – **Model error, not AFF error.**

Did not build the AFF GIS Model to be a regulatory overlay – it was developed to compare the performance of the different alternatives.

The western Washington tribes changed their preferred alternative from Alternative A to Alternative A4 7% in response to the findings from the spatial analysis to address concerns expressed by landowners and to improve the performance of the AFF.

The key to a successful implementation of alternative A4 7% will be in how barriers are defined in rule and in board manual.