From:	ANDERSON, PATRICIA (DNR)
To:	Ballash, Heather (COM); Bernath, Stephen (DNR); Bob Guenther (gbob294@aol.com); Brent Davies; Capper, Patrick (AGR); Carmen Smith; David Herrera (dherrera@skokomish.org); Davis, Jeffrey P (DFW); Ferester, Phil (ATG); Laurie, Tom (ECY); Lisa Janicki; Noel Willet; O"Brien, Patricia (ATG); Paula Swedeen (swedeenconsulting@gmail.com); Tom Nelson
Cc:	Ribera, Amy Lyn (DNR); ANDERSON, PATRICIA (DNR); BERGE, HANS (DNR); Burgeson, Terri (DFW); Doenges, Rich (ECY); ENGEL, MARC (DNR); FELIX, SHERRI (DNR); GRANBERG, COLLEEN (DNR); Leslie MacMillan (lmacmillan@skokomish.org); Linda Hammons; MAHAN, DONELLE (DNR); RATCLIFF, MARC (DNR); SHRAMEK, JOSEPH (DNR); Karen Terwilleger; Laura Berg - Washington State Association of Counties (lberg@wsac.org); Mary Scurlock (Mary.Scurlock@comcast.net); Tim Romanski
Subject:	FW: WFPA recommendation for PHB Path Forward
Date:	Monday, February 12, 2018 6:35:05 PM

Evening Board Members
See message below from the Washington Forest Protection Association. A paper copy will be available for you tomorrow.

Patricia Anderson
Forest Practices Board
Department of Natural Resources
360.902.1413

From: Karen Terwilleger [KTerwilleger@wfpa.org]
Sent: Monday, February 12, 2018 3:16 PM
To: Bernath, Stephen (DNR); ANDERSON, PATRICIA (DNR)
Cc: Mark Doumit
Subject: WFPA recommendation for PHB Path Forward

Dear Chair Bernath and Forest Practices Board Members:

The Washington Forest Protection Association offers the following alternative for consideration and evaluation as an interim water typing solution by stakeholders and the Forest Practices Board (Board).

- Our proposed alternative is consistent with the Fish Habitat Assessment Method and expectations of the water typing system adopted by the Board.
- We have built upon and incorporated the Science Panel's work and recommendations.
- We have conducted and incorporated additional analysis of PHB alternatives that recognizes the Board's need to understand accuracy and error allocation in their decision-making and analysis.
- In response to stakeholder feedback, we have included adjustments to the Fish Habitat Assessment Method (FHAM) process to address protections on streams likely to be used by anadromous fish where protocol surveys conducted within the prescribed FHAM may not capture the full extent of habitat likely to be used by those species.
- We are committed to supporting the completion of supplemental analyses, including a spatial analysis of potential PHB alternatives, to include multi-stakeholder representation and oversight to refine and more fully develop a recommendation that includes specific numeric criteria in time for use in the 2019 field season.
- We support the Board's identification of several alternatives to be assessed for cost, benefit and accuracy considerations.

The Board would direct assessment of the following:

- Accuracy and directional error distances for PHB alternatives listed below and any additional PHB alternatives identified by the multi-stakeholder group to be evaluated against known

upper extent of fish use and concurred WTMF EOH points.

- Floor-based and other alternatives for determining the extent of anadromous fish habitat for connected tributaries adjacent to anadromous habitat;
- PHB evaluations in E WA should include assessments incorporating CMER E WA study results and databases.

The assessment will include a spatial analysis of alternatives and be designed to support the analysis of public resource benefits, economic impacts and alternatives required under the Administrative Procedures Act and compare levels of accuracy and error allocation. The assessment will also support the Water Typing Objectives identified by the Board in August 2015 and included in the Forests and Fish Report and Forest Practices Habitat Conservation Plan: use of the existing information, develop a method for addressing streams not on the hydro layer, make methods as accurate as possible, balance error, minimize electrofishing, improve map over time, develop methods to locate the stream break points on the ground, and ensure the methods address small forest landowners.

<u>Alternative #1</u>: For Both Eastern and Western Washington. For Western Washington, measures below would apply above an "anadromous overlay" described below.

- PHB #1: Change of 5% gradient (both Eastern and Western Washington)
- PHB #2: .7 or .8 ft upstream/downstream ratio (both Eastern and Western Washington)
- Fish Passage Obstacle (both Eastern and Western Washington):
  - *Vertical*: 3 ft non-deformable step
  - *Non-vertical*: Obstacle gradient over 20% and change in elevation over obstacle distance greater than the upstream bankfull channel width.
- For Western Washington, the Board would further direct the development of an "anadromous overlay" to define the extent of core anadromous waters likely to be used by anadromous fish in Western Washington. The extent of the core anadromous waters with be determined using a combination of information describing known anadromous fish use, and likely anadromous fish use based on a gradient floor, the presence of permanent natural barriers to anadromous fish movement, and stream size considerations. Specific criteria and data to identify the core anadromous zone will be developed in cooperation with the multi-stakeholder Fish Habitat Technical Group and will include a range of gradients to be tested between 2-10%.

<u>Other Alternatives as requested & agreed to by the board</u>

Patricia, would you kindly forward this to the Board. Thanks. kt

Karen Terwilleger
Senior Director of Forest and Environmental Policy
Washington Forest Protection Association
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