



**Washington State
Department of Transportation**
Paula J. Hammond, P.E.
Secretary of Transportation

Transportation Building
310 Maple Park Avenue SE
Olympia, WA 98504-7300
360-705-7000
TTY: 1-800-833-6388
www.wsdot.wa.gov

March 8, 2013

Mr. Bob Zeigler
SEPA/NEPA Coordinator, Regulatory Services Section
Washington Department of Fish and Wildlife
600 Capitol Way North
Olympia, WA 98501-1091

Dear Mr. Zeigler:

Thank you for the opportunity to comment on the Washington Department of Fish and Wildlife (WDFW) non-project SEPA review of the draft *Water Crossing Design Guidelines*. As you may be aware, the Washington State Department of Transportation (WSDOT) has been actively involved with WDFW on the review of these guidelines for more than four years.

WSDOT believes that most of the prescriptive guidance has been removed during the collaborative review process, allowing practitioners to design stream crossings specific to site conditions. WSDOT still believes some of the guidance is based on arbitrary standards. However, WDFW has provided for designers to utilize well-vetted documents such as AASHTO and FHWA guidance in its place, which allays some of our concerns.

One specific comment that the two agencies have been unable to agree on comes from the Hydraulic Design/Fishway section, related to roughened channels being classified as fishways. Traditional fishways have far more serious environmental impacts and are much less effective than roughened channels. We have discussed this with WDFW staff but were unable to come to an agreement.

Using roughened channels to stabilize the grade of a stream segment is an innovative technology that can have significant environmental benefits when compared to traditional grade control methods. Automatically classifying roughened channels as "fishways" triggers an onerous set of monitoring requirements. The greater complexity and cost of such requirements may cause project proponents to avoid this approach. Not using any type of grade control could have significant impacts and risk upstream habitat and infrastructure by allowing the upstream propagation of a head cut.

- We urge WDFW to include a clear definition of "roughened channel". We are not in agreement that all roughened channels, as we understand the term, are fishways.
- If a head cut is allowed to propagate through a new crossing, there could be detrimental effects to habitat and infrastructure upstream. This is not always a good solution for a new crossing and represents a flaw in the design guidance. The head cut would also be at

Mr. Bob Zeigler
March 8, 2013
Page 2

risk of becoming a fish passage barrier itself or of causing upstream infrastructure to become a fish passage barrier. Water crossings are site-specific and a “one-size fits-all” solution (as is being proposed) is not a good approach.

WSDOT staff propose that a new category be developed between the stream simulation and the roughened channel fishway. The channels in this new category would not be considered stream simulation if they exceed the upstream or downstream channel slope by more than 25%. At the same time, they would not be in the category of “fishways” if they exceed the upstream or downstream channel slope by no more than 50%, and the constructed channel does not exceed a 6% slope. In these cases, the site proponent would not “walk away” from these sites but would periodically evaluate them as needed to ensure they are functioning as planned. However, the proponent should not be required to monitor them in perpetuity as would be required for a fishway.

Again, we appreciate the opportunity to comment on this non-project SEPA review of the draft *Water Crossing Design Guidelines*. We hope you will take these comments into consideration before the guidelines are considered complete.

Sincerely,



Megan White, P.E., Director
Environmental Services Office

MW:da