



Confederated Tribes and Bands  
of the Yakama Nation

Established by the  
Treaty of June 9, 1855

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September 2, 2014

Washington Dept. of Fish and Wildlife  
ATTN: Lisa Wood, SEPA/NEPA Coordinator  
600 Capitol Way N.  
Olympia, WA 98501-1091

RE: DNS 14-059; Stray Gulch Road Construction

Dear Ms. Wood,

We just became aware of this project and SEPA determination by the department. The project appears to have potential for significant adverse impacts. We have not been provided adequate time to properly evaluate the project. We would therefore respectfully request that the comment period be extended an additional 30 days.

From our very preliminary evaluation, the project proposal has not fully evaluated, described and addressed all impacts. This road project can only be accessed by several miles of stream-adjacent roads (e.g. Tekison, Brewton Gulch) that cause adverse impacts to the stream system. The SEPA documentation has not discussed these associated, connected and cumulative impacts of the project, other than maintenance will take place on these roads. The SEPA documentation also had little information on the design or location of erosion control measures for the Stray Gulch Road. Where and how many drivable dips will be installed? How will the outsloped road surface be maintained with vehicular use? How will ford crossings and their approaches be designed and constructed to prevent sediment delivery? Further, the proposed project would reopen the Stray Gulch Road to vehicular use, compared to the currently closed status. Vehicular traffic on the road will increase erosion, sediment transport and sediment delivery. Some portions of the Stray Gulch Road would also still be in close proximity to the stream with likely impacts to water quality and stream function. All of these expected adverse impacts need to be adequately explained, evaluated and addressed in SEPA prior to making a decision on this project.

In closing, we have not been given sufficient time to review this project for resource concerns and therefore request the comment period be extended an additional 30 days. In addition, expected adverse impacts from the miles of stream-adjacent access roads, increased vehicular traffic on the Stray Gulch Road, ford crossings, other road cross drainage, and segments of the Stray Gulch Road in close proximity to the stream need to be clearly explained, evaluated and addressed in SEPA.

If the department won't extend the comment period and address our concerns, I would request this project be given a Determination of Significance and an Environmental Impact Statement required due to anticipated adverse impacts to the stream system.

Thank you for your time and attention on this important matter.

Sincerely,



Philip Rigdon, Deputy Director  
Natural Resources Department

C: (files)

Sam Jim, YN Tribal Council  
Julio Carranza, Office of Legal Counsel  
Paul Ward, YN Fisheries  
Scott Nicolai, YN Fisheries  
Jim Matthews, YN Fisheries

Philip Anderson, WDFW  
Mike Livingston, WDFW