



September 10, 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,

The department provided a very brief extension to the comment period on this project. We are still evaluating the project, but have identified several issues that have not been adequately addressed and are expected to have significant adverse impacts on the environment. As such, we oppose approval of this project and request it be cancelled. The project as outlined has ample opportunity for significant adverse impacts to water quality, fish habitat, stream and riparian function, hydrology, and floodplain function. If the department is unwilling to withdraw this project, a Determination of Significance is warranted under SEPA and an Environmental Impact Statement must be required (WAC 197-11-330 (4)).

From our brief review, the department has failed to adequately explain or address how the project will prevent significant adverse impacts. The following are major issues we see with the project and support our position that the project has significant adverse impacts:

1. The environmental checklist contains few details on the project and measures to prevent adverse impacts. In light of incomplete or unavailable information, if the agency proceeds, it shall generally indicate in the appropriate environmental documents its worst case analysis (WAC 197-11-080 (3)).
 - a. The checklist indicates that 1.2 miles of new road will be constructed with native material for surfacing (rock and dirt) and have outsloping and drainage dips. No specific information is provided on the location or design of the outsloping and drainage dips, or more importantly the efficacy of these measures to prevent adverse impacts to the stream system. The checklist also mentions two fords would be constructed across seasonal streams, but no details are provided on these crossings or how sediment will be kept out of streams.
 - b. The environmental checklist notes that surface erosion may occur as a result of snowmelt or intense rain until vegetation has been re-established. This new road would be open to vehicular traffic which would prevent establishment of vegetation. Vehicular traffic on the road will increase erosion, sediment transport

- and sediment delivery. Chronic erosion of the road and sediment delivery to streams would be expected. Further, the road is to be constructed of native material which has a much higher erosion rate than other road types (e.g. rock surfacing).
- c. The checklist indicates the new road would be 50 to 250 feet from the creek. Several studies have shown that sediment-laden runoff from roads can travel more than 200 feet downslope distance. The checklist provides no explanation or assurance how the new road will prevent sediment delivery to streams and other adverse impacts.
2. The checklist has virtually no mention or assessment of associated, connected or cumulative adverse impacts from this project. This project would reconnect and reopen the Stray Gulch Road. No discussion is provided on adverse impacts of the old road further up the drainage. Of greater concern, this dead-end road can only be accessed by miles of stream-adjacent roads up Tekison Creek and Brewton Gulch. These roads running up the stream bottoms have significant adverse impacts on water quality, fish habitat, and riparian and floodplain function. The roads cause sediment delivery, confine stream channels, reduce riparian vegetation, degrade fish habitat, accelerate runoff and greatly limit groundwater recharge and storage. The department did not consider or take into account these significant adverse impacts when making a threshold determination on the project as required under WAC 197-11-330.
 3. This project completely contradicts the rationale and justification made by the department under SEPA to close the Stray Gulch and Tekison Roads in 2011. Under the checklist for SEPA DNS #11-073, the department stated, "Both roads have erosion issues, as high spring-time flows spread in the roads and damage them... We need to abandon these roads to improve water quality and protect cultural resources." Further, in response to comments on the closure, the department stated, "Research studies have overwhelming shown negative impacts of stream-adjacent roads to aquatic life... The soils along these roads are classified as gravelly sandy loams, and are highly susceptible to degradation due to disturbance. When roads run parallel and adjacent to creeks they collect and channel water which eventually finds its way back to the stream, along with sediment that has been picked up along the way." And "Given the WDFW's mandate to protect, restore and enhance fish and wildlife and their habitats, closing these roads and improving habitats is justified." We agree with the 2011 SEPA final decision that the Stray Gulch Road needs to be abandoned to protect resources. Merely relocating a piece of the road a short distance from the stream and opening up the entire length to vehicular traffic is counter to the decision in 2011/2012.
 4. The checklist says no known threatened or endangered species are on or near the site. Again, this contradicts the previous 2011 SEPA for closure of the Stray Gulch and Tekison Roads by the department which appropriately lists upper Columbia Steelhead (in or near Tekison and Stray Gulch) and Chinook salmon (in Columbia River). The department must determine the impacts of this proposal on endangered or threatened species or their habitat as required under WAC 197-11-330 (3).
 5. This project and SEPA undermines and is contrary to the Colockum Wildlife Area Management Plan (CWAMP) by the department. The CWAMP has an Agency Objective to protect and restore riparian habitat and under Strategy A it states, "Implement permanent road closures in Tekison Creek and Stray Gulch. Provide

alternate road access to West Bar and Brushy areas.” Does the department completely ignore its own management plans? We support road closures for the protection of fish and riparian habitat. We also support maintaining access to the wildlife area by utilizing alternate roads away from streams.

In closing, there is ample evidence that this proposed project and associated access roads will have cumulative, significant adverse impacts on water quality, fish and riparian habitat, and stream and floodplain function. I am also highly disappointed that this project flies in the face of the assurance by WDFW Director Phil Anderson to me that we address problem roads in this area in a transparent and strategic manner. We were not informed or had input into this project. I highly question how this project is strategic, economically justified, or ultimately meets the overarching mandate of the department to protect, restore and enhance fish and wildlife and their habitats. I would respectfully request this project be withdrawn. Otherwise, this project warrants a Determination of Significance, and an Environmental Impact Statement must be required that fully evaluates all potential adverse impacts.

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, YN Office of Legal Counsel
Dawn Vyvyan, YN Legislative Analyst
Paul Ward, YN Fisheries
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