



Quinault Indian Nation

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September 5th 2017

Lisa Wood

WASHINGTON DEPARTMENT OF FISH AND WILDLIFE

PO Box 43200 Olympia, WA 98501

RE: DNS 17-044: Wynoochee River Fishing Access

This letter is in reference to Determination of Non significance (DNS) 17-044: Wynoochee River Fishing Access. The Quinault Indian Nation (QIN) has federally guaranteed treaty fishing rights on the Wynoochee River, on which the proposal is located. The Wynoochee River is a tributary to the Chehalis Watershed and provides important spawning, rearing, and migration habitat for Chum, Steelhead, Chinook, and Coho. The current draft of the proposal as documented in DNS 17-044 will create net loss of ecological functions and ultimately violate QIN's treaty fishing rights if approved without modifications and mitigation outlined below.

On July 12th QIN biologists met onsite with WDFW and other regulatory agencies to discuss the proposal. Many questions and comments were made to WDFW by all parties. We were under the impressions that we would receive an update about our questions and comments. This letter is to reinforce comments made in the field and to offer comments on the WDFW SEPA.

The proposal includes an installation of a 36-inch diameter culvert in a fish bearing side channel. The channel Bank Full Width is 11.8 feet. A 36-inch diameter culvert is not an adequate size for the site. It will not pass the 100-year flood and it does not meet WDFW's Hydraulic Codes or Stream Design Manual to provide fish passage. I recommend a bridge or a stream simulation methodology of appropriate size to support natural stream functions, fish passage, and hydraulic function. If a larger water crossing structure is not installed to WDFW codes, we cannot support this proposal.



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The SEPA mentions the existence of the Wynoochee Channel Migration Zone (CMZ) and that the project is not within the CMZ, but the SEPA provides no assessment or map to support this. To properly assess if the project may cause any significant adverse impacts the aquatic and riparian ecosystems more information is needed. I recommend including a Channel Migration Zone Assessment consistent with Department of Ecology's Shoreline Master Program Guidelines.

The SEPA mentions there will be no measures to reduce or control surface, ground, and run off water. The proposal will include 100's of vehicles with trailers driving near the Wynoochee River during periods of high precipitation. This will result in sediment-laden water delivering into the river via launching boats and driving on the forest roads found within the project area (and indirect increased potential sediment deliver from increased traffic on the 7400 RD). Fine sediment delivery to typed bodies of water violates the Forest Practices Act. Conditions and mitigation will be needed to control surface run off water, and drainage pattern impacts to avoid adverse environmental impacts. Possible solutions should include seasonal restrictions to public access, limit sediment delivery, and collaboration with Green Diamond staff on this topic.

The SEPA mentions "Through the Forest Practices review process, tribal biologist have visited the site" under the Historic and cultural preservation portion. This statement could be misconstrued that there was a cultural consultation, the site visits mentioned were conducted by myself (TFW fish habitat biologist) to review potential natural resource damage. No official consultation for cultural resources with QIN have been conducted. We recommend consultation with QIN's cultural specialist (Justine James) .

Thank you for the opportunity to review. Please contact Caprice Fasano with any new drafts and further permitting pre applications and or notices.

Sincerely,

A handwritten signature in black ink that reads "Caprice Fasano".

Caprice Fasano

TFW Fish Habitat Biologist