Conservation Caucus Supports Alternative A4(10%)

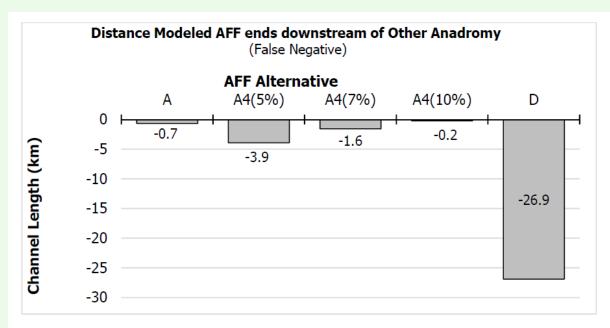
- 1. Minimizes Electrofishing
- 2. Covers the majority of anadromous fish reference data
- 3. F/N Overshoots are addressed in the field
- 4. 10% gradient well below default physical criteria in rule
- 5. Re-calibrates risk balance
- 6. Repeatable, enforceable, and implementable
- 7. Address significant SWIFD shortcomings
- 8. Urgency

Alternative A4(10%) Minimizes Electrofishing

- 1. FFR and FPHCP do not provide coverage for e-fishing to type waters
- 2. E-fishing is imperfect
- 3. E-fishing can harm fish, is laborious and costly
- 4. FP Board motion 8/11/2015 asked Policy to develop a water typing rule that would "minimize electrofishing"

Alternative A4(10%) Covers Majority of Anadromous Fish Data

- 1. A4(10%) is second-most risk-averse alternative
- 2. Captured the majority of the model's anad. fish ref. data



Addendum Figure 4 (equivalent to Figure 10 in main report). Bar chart showing the length of stream in which the modeled AFF ends downstream of the 'other anadromy' data (False Negatives).

Alternative A4(10%) Covers Majority of Anadromous Fish Data

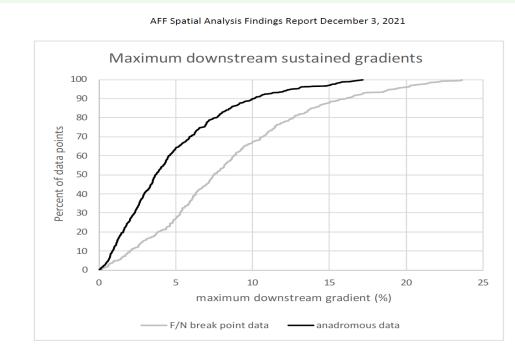


Figure 16. Cumulative distribution of maximum sustained downstream gradient below the observed and presumed anadromous fish data points and F/N break data points in all analyzed basins. Outliers were removed from the plot using the 'Tukey's Fences' metric. In many cases, we discovered these outliers were mis-mapped data points on top of road prisms or other unnaturally steep channel sections.

Alternative A4(10%) F/N Overshoot Concerns

- 1. All alternatives overshot F/N breaks to varying degrees
- 2. Relatively few locations with long overshoots
- 3. A number of possible explanations but most commonly end of fish features in stream were not incorporated the AFF model.
- 4. Field implementation should catch these features.

Alternative A4(10%) Is Below Default Physical Criteria in Rule

1. WAC 222-16-031 defines default Type F fish habitat in stream reaches that extend up to 16% or 20% channel gradient depending on basin area (<50 acres>).

Alternative A4(10%) Re-Balances Risk

- 1. Interim rule inappropriately places the burden on fish presence to prove fish habitat.
 - a) Fish Habitat means habitat, which is used by fish at any life stage at any time of the year including potential habitat likely to be used by fish, which could be recovered by restoration or management and includes off-channel habitat. (WAC-222-16-010)
- 2. A4 (10%) reduces this burden by presuming lower gradient streams are fish habitat unless otherwise demonstrated
- 3. The AFF is integral to the western Washington tribe's proposal for the fish habitat assessment method

Alternative A4(10%) Is Repeatable, Enforceable, and Implementable

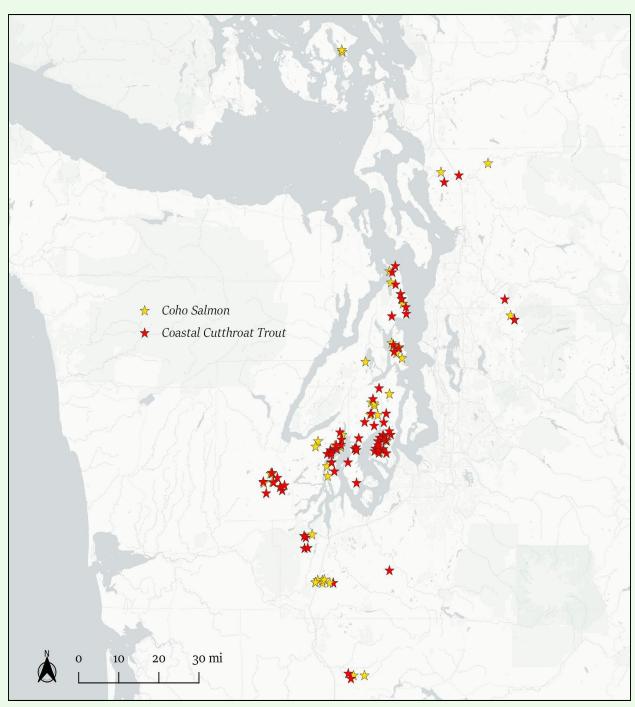
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- 2. Draft CBA in 2019 found negligible costs associated with implementation

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Alternative A4(10%) Addresses Significant SWIFD Shortcomings

- WDFW + NWIFC warned about reliance on SWIFD for anadromous distribution.
- 2. Recent WFC analysis documented 23 MILES of coho presence not included in SWIFD



Alternative A4(10%) Should be Adopted with Urgency

- 1. Salmon populations are a fraction of historical abundance
- 2. Habitat impacts are a significant driver
- 3. Climate change is exacerbating those impacts
- 4. Huge public investments in habitat restoration, recovery will require better protection of existing riparian habitat
- 5. The FPHCP provides riparian protections assuming implementation of an effective (permanent) water typing system to meet CWA and ESA, and provide a harvestable supply of fish.

A4(10%) w/ ID Teams best achieves the FP Board Motions and commitments made in the FPHCP.