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Comments: [Comments from attached letter "YN to USFS Twisp Restoration Draft EA Nov 6 2020_Signed.pdf" below.]

November 6, 2020 Sent via Email

Ms. Kristin Bail Forest Supervisor

c/o Ms. Eireann Pederson Project Leader

Methow Valley Ranger District 24 West Chewuch Road Winthrop, WA 98862

RE: Twisp Restoration Project Draft Environmental Assessment Dear Ms. Bail,

On December 11, 2019, the Yakama Nation Department of Natural Resources submitted specific project scoping recommendations to Ms. Eireann Pederson regarding the Twisp Restoration Project. As noted in the scoping comment letter, the Yakama Nation has had direct engagement in developing aquatic restoration priorities with the Okanogan[shy] Wenatchee National Forest under Master Cost Share Agreement 16-CS-11061700-055, and through our participation in the Twisp Restoration Projects Work Group within the North Central Washington Forest Health Collaborative. Indeed, the Yakama Nation specifically funded and produced extensive aquatic habitat data collection and analysis products for the Okanogan-Wenatchee National Forest to directly assist in developing the Twisp Restoration Project¹. As with our scoping period comments, we remain very supportive of this project being implemented in a timely manner that is focused on providing the highest benefit to ESA listed fish stocks in these critical watersheds.

Despite our overall support for the need and scope of this project, through this current comment letter we wish to note that the draft Environmental Assessment (EA) dissapointingly omits our one specific request for additional analysis regarding quantifying and potentially mitigating for existing road system impacts to floodplain and alluvial fan habitats where anadromous fish occur. The omission of this request was reasoned on page 20 of the draft EA under the section "Alternatives Considered but Eliminated from Detailed Study - Maximize Aquatic And Wildlife Restoration", stating that "maximizing habitat restoration for aquatic species would generally entail closing or decommissioning more roads" and that this request could "limit access for current and future vegetation management and wildfire hazard reduction treatments, as well as access for public use and enjoyment of the project area...".

¹ Upper Twisp River and Tributaries Habitat Assessment Qanuary, 2018), available upon request, and Middle Twisp River Reach Assessment & Restoration Strategy (February, 2015), <http://yakamafish-nnsn.gov/sites/default/files/projects/Middle%20Twisp%20Reach%20Assessment%20-%20Final%20Report.pdf>

We strongly disagree with this stated conclusion from the draft EA. Our scoping request clearly recognized that "road removal may not be possible in these areas given other USFS resource objectives". For this reason we recommended in our scoping comments that if "modifications or road decommissioning and removal is not feasible, but substantial losses of habitat have occurred, identify other habitat mitigation opportunities in adjacent

floodplain areas where fish production can be increased to offset the direct road infrastructure impacts". As we also stated, it is appropriate "in a landscape scale restoration project ... to take into account these types of acute habitat impairments and identify strategies to off-set or mitigate the habitat losses, especially when high value tribal resources such as anadromous fish stocks are effected by the impairments."

The idea that our recommendation was so boldly disregarded based on a clearly deficient interpretation of our scoping comments is concerning. As we have already demonstrated with other components of the project planning work for the Twisp Restoration Project, we would have gladly engaged with the USFS project development team to assist in conducting this analysis and propose adequate mitigation strategies if requested. The lack of robust analysis on this matter by the Okanogan-Wenatchee National Forest definitively weakens the overall restorative value of this proposed project. Such a short sighted outcome is unsatisfactory given that the Twisp River Watershed is a critical area for anadromous fish production and many salmon recovery resources are readily available to support exactly this type of work.

Despite this opportunity being missed in the current scope of the Twisp Restoration Project, the Okanogan-Wenatchee National Forest still has the opportunity and responsibility to objectively quantify and mitigate for USFS infrastructure habitat impairments affecting anadromous fish stocks. As such, we highly recommend that Okanogan-Wenatchee National Forest continue to work with the Yakama Nation Fisheries Upper Columbia Habitat Restoration Project to develop ancillary habitat improvement projects in the Twisp River Watershed and the broader analysis area (including the Wolf Creek drainage). Our Habitat Restoration Biologists have many habitat restoration concepts that have been developed with good science and data that can help to further boost anadromous fish production on USFS managed lands. We would very much appreciate as many of these actions being implemented as possible to ensure that the Okanogan[shy] Wenatchee National Forest is adequately protecting and restoring high value tribal resources.

Please contact Hans Smith (509) 449-2750 or smih@yakama.nsn.gov with any questions about these comments or me at (509) 865-5121 x4655 or phil_rigdon@yakama.com to schedule a meeting to discuss the Yakama Nation's comments.

Sincerely,

Phil Rigdon, Superintendent

YAKAMA NATION DEPARTMENT OF NATURAL RESOURCES