



January 14, 2020

Chehalis ASRP Steering Committee
300 Desmond Drive SE,
Lacey, WA 98503

Also submitted electronically via: <http://chehalisbasinstrategy.com/asrp/asrp-comment-form/>

RE: Comments on Chehalis Basin Strategy, Aquatic Species Restoration Plan, Phase 1 Draft Plan

Trout Unlimited (TU) and the Washington Council of Trout Unlimited (collectively referred to in this document as “TU”) greatly appreciate the opportunity to comment on the on the *Chehalis Basin Strategy Aquatic Species Restoration Plan (ASRP) Phase 1 Draft Plan*. As we mentioned in previous Chehalis Basin Strategy planning comments, Trout Unlimited is passionate about protecting and restoring fish populations and their habitats in the Chehalis Basin. With the Chehalis Basin being the second largest watershed in Washington and supporting what is likely the largest floodplain matrix in the state, we see the ASRP as a spectacular opportunity to advance recovery of WA Chinook and steelhead runs that teeter on the edge of Endangered Species Act (ESA) listings – we are dedicated to working with the various Chehalis Basin stakeholders and partners to see this opportunity come to fruition.

TU has been actively engaged in the public processes associated with the Chehalis Basin Strategy since 2015. This includes participation in public meetings and providing comments on the various planning documents associated with the Chehalis Basin Strategy, including the Washington State Draft Programmatic EIS (PEIS) in 2016, the draft ASRP in 2017, and scoping for the Proposed Chehalis River Basin Flood Damage Reduction Project Environmental Impact Statement in 2018.

Our comments are as follows:

- **High Quality Document:** We appreciate the extremely high level of effort put forward by the ASRP preparers and the attention to detail included in the Draft Plan – it is an impressive body of work reflecting high scientific rigor and a deep understanding of the Chehalis Basin ecosystem and its restoration needs. TU whole-heartedly concurs with one of the primary guiding principles of the ASRP Draft Plan: the status quo is not an option for the Chehalis Basin and the species that depend on it. Overall, while TU applauds the ASRP Phase 1 Draft Plan’s ambitious approach to restoration, the fact that proposed restoration scenarios are presented largely independent from the confines of fiscal, political, and social constraints makes it difficult to provide substantive comments that will add significant value for implementation. Therefore, we have chosen to largely limit our Phase 1 comments to high-level recommendations for the ASRP process, with more detailed comments planned for Phases 2 and 3.
- **TU strongly supports Scenario 3** in the Draft Plan, as it provides the greatest benefit to salmon, steelhead, and other aquatic species in the Chehalis Basin. We appreciate the approach the ASRP takes to phasing implementation based on priority and urgency; shovel-ready projects should be implemented as soon as possible, and high-priority actions should be expedited.
- **Increase capacity for implementation:** TU views the Phase 1 ASRP as a helpful framework and comprehensive, high-level summary of existing conditions and desired habitat outcomes in the Chehalis Basin. This is helpful for TU as we strive to advance opportunities for engagement in the

ASRP effort. Currently, the basin lacks the capacity to implement such a robust plan in a reasonable timeline. Building practitioner capacity to implement the ASRP should be a very high priority.

- **Property acquisition should be high priority:** TU encourages a swift and robust evaluation of potential floodplain land acquisition options (and a greater emphasis placed on acquisition in the Draft Plan), as this represents the most cost-effective and expeditious approach to improving floodplain process and reduce flood risk. The ASRP should include an opportunistic and agile property acquisition strategy, as opportunities for acquisition of key properties are currently being missed.
- **Focus restoration actions on already protected lands:** To expedite the implementation of the ASRP, actions should be prioritized for properties that are already held in conservation status. This assures investments are beneficial well into the future.
- **Focus actions on the best available Climate Science:** Priority restoration actions should focus on reconnection projects improving access to coldwater refugia areas identified by the Chehalis Thermalscape project work and restoration and/or protection projects within these reaches. The cold water refugia areas identified by this work should be of high importance for restoration and/or protection in the ASRP.
- **Coordination and Capacity is Key:** Successfully implementing the ASRP's ambitious vision in the necessary timeframe to bring about the desired outcomes stated in the Draft Plan will require a monumental, concerted restoration effort and close coordination among stakeholders and implementation partners. We strongly recommend the Chehalis Basin Board consider the establishment of an Implementation Team comprised of key stakeholders tasked with developing a Master Plan for the ASRP, with corresponding ecoregion action teams tiered within the Implementation Team/Master Plan structure. We recommend appointing individuals/organizations well-versed in large-scale aquatic habitat restoration projects/efforts to leadership roles within this institutional framework to ensure efficient coordination of implementation activities.
- **Implement ASRP independent of Flood Hazard Reduction Actions:** TU was encouraged to see the explicit separation of ASRP implementation from flood hazard reduction activities in the document, and we whole-heartedly agree with this approach. We do, however, see the writing on the wall in terms of raising funding for the ASRP: will the ASRP be possible without mitigation money from a dam? We sure hope so.
- **Mitigating Uncertainty:** TU understands the significant challenge in developing a sweeping watershed-scale restoration plan amidst significant financial, political, and social uncertainty that will ultimately dictate on-the-ground implementation. We again commend the ASRP team for thinking big and using a robust, science-based approach to develop such a comprehensive framework for restoration planning. Basin-wide comprehensive habitat restoration/flood reduction/agricultural preservation plans are growing in momentum across the West, and we encourage the ASRP team and the Chehalis Basin Board to take advantage of lessons learned from other models (such as the Yakima Basin Integrated Plan), so that the Chehalis Basin Strategy and ASRP can reap the associated benefits and efficiencies of comprehensive planning. TU understands the Flood Hazard Plan is currently being developed independently of the ASRP; we believe there is significant benefit (bordering on necessity) to consider these two plans

independently, while recognizing they are within the greater Chehalis Basin Strategy. As the overarching Chehalis Basin Strategy has stated, the ASRP should not be considered mitigation for any Flood Damage Reduction actions.

- **Resource Management impacts on ASRP investments:** Hatchery impacts on fishery populations, harvest impacts on fishery populations, and hydropower impacts on all aquatic species should be incorporated in the ASRP to promote the best possible return on investment for ASRP actions. Currently, the ASRP does not incorporate several WDFW studies and management plans (e.g. Hatchery Genetic Management Plans, Statewide Steelhead Management Plan, etc.) to project wild fish populations and other aquatic species. Additionally, the ASRP does not address water quantity issues. Purchase of water rights, enforcement of illegal water withdrawals, and strong regulation limiting water withdrawals during drought periods, should be considered as actions in the ASRP.
- **Maximize Stakeholder Participation:** TU feels it is critical to provide ample public participation and stakeholder collaboration opportunities during the development and evolution from Draft Plan to Final Plan. Continuing a trajectory of increasing stakeholder engagement is highly recommended, and we encourage the Board to facilitate the organization of regionalized stakeholder groups to maximize inclusion, communication, and efficiency.
- **Prioritize Outreach and Communication:** Public support and landowner buy-in for the ASRP is critical to its success, and we therefore encourage development of a strong Outreach and Communications Plan (and plans to raise associated funding) to accompany the ASRP. Outreach efforts should include communication to policy makers about the benefits of proactive restoration actions designed to prevent ESA listings of salmon and steelhead and the severe financial consequences of failing to seize this opportunity.

Trout Unlimited is grateful for the opportunity to provide input on the ARSP Phase 1 Draft Plan, and we appreciate your consideration of our comments. Please contact us with any questions. We look forward to continued engagement with the ASRP and the Chehalis Basin Strategy.

Sincerely,



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