



## Lake Washington/Cedar/Sammamish (WRIA 8) Watershed

201 S. Jackson Street, Suite 600  
Seattle, WA 98104-3855

November 8, 2018

*Re: Comments on Net Ecological Benefit Guidance*

To Whom It May Concern:

Thank you for the opportunity to provide comments on the preliminary determination of net ecological benefit (NEB) as described in the streamflow restoration law. Please consider the following comments.

### Net Ecological Benefit

The net ecological benefit (NEB) interim guidance states that “NEB evaluations should make use of available information on watershed-specific factors.” As noted above, WRIA 8 is a watershed where most development is concentrated within the urban growth area boundaries, and relatively few new permit-exempt domestic wells are anticipated in this watershed. As a result, we expect that certain types of fish habitat enhancement projects—those designed to mimic natural processes and form new habitats over time—will cumulatively offer the greatest benefits to stream flows in this watershed. Consistent with the emphasis on instream resources that support threatened and endangered salmonids, much of the habitat enhancement work underway and planned in WRIA 8 is targeted at the recovery of Chinook salmon listed as threatened under the Endangered Species Act.

In 2017, WRIA 8 completed an update to its Chinook salmon [recovery plan](#). This plan outlines twenty strategies that are most important for Chinook recovery in the watershed and an extensive suite of associated habitat protection and restoration projects. Many of the strategies and projects identified in the plan will either directly or indirectly provide benefits to streamflow through acquisition (for example, acquiring floodplain properties and headwaters areas) and the restoration of habitat forming processes. Restoring process and habitat function is perhaps the best way to achieve streamflow benefits in WRIA 8, and these activities should be recognized for their potential to achieve the objectives of the streamflow restoration program under RCW 90.94.

Thank you for considering these comments on the net ecological benefit interim guidance. For questions or to learn more about the ways WRIA 8 salmon habitat activities can support implementation of the streamflow restoration law, please contact me at 206-477-4780 or [jason.mulvihill-kuntz@kingcounty.gov](mailto:jason.mulvihill-kuntz@kingcounty.gov).

Sincerely,

Jason Mulvihill-Kuntz  
WRIA 8 Salmon Recovery Manager