



Lake Washington/Cedar/Sammamish (WRIA 8) Watershed

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

October 26, 2018

Re: Comments on Streamflow Restoration Preliminary Draft Rule for Chapter 173-566 WAC

To Whom It May Concern:

Thank you for the opportunity to provide comments on the preliminary streamflow restoration funding rule as described in the streamflow restoration law. Please consider the following comments.

Streamflow Restoration Draft Funding Rule

We understand a stated intent of the law outlined by Chapter 90.94 RCW is to protect and enhance streamflows. The proposed language for Chapter 173-566-150 WAC, Funding Priorities, indicates that riparian and fish habitat improvement projects are medium priority (the lowest of two priority categories identified). Under Chapter 173-566-230, the proposed rule states that riparian and fish habitat improvement projects eligible for funding through this program are those that will offer benefits to instream resources but suggests these projects may not contribute to streamflow benefits.

While the streamflow benefits resulting from habitat enhancement actions of the type identified in this section may not be measured as easily as water storage projects, habitat projects do offer important benefits to streamflow, especially when considered cumulatively within a watershed (sub-basin or basin scale). As examples, floodplain reconnection projects coupled with in-channel large wood installations can allow surface water to infiltrate in the floodplain and promote groundwater recharge. Land acquisitions—especially of parcels located in the floodplain—lead to decommissioning of wells that may affect streamflow, as well as set the stage for restoration activities that provide additional flow benefits.

In WRIA 8, much of the recent land development is concentrated within the urban growth area, and it is anticipated that most future development will follow suit. As a result, we do not anticipate significant impacts to streamflows from permit exempt wells over the next twenty years, and it follows that some of the greatest contributions to flows may come from the cumulative benefits derived from habitat enhancement activities. We request that this local condition be accounted for in the final funding rule, placing fish and riparian habitat enhancement projects at the same priority level as water storage projects. Additionally, it is important for the final funding rule to acknowledge that costs of implementation differ across the state. For the statewide grant program, the evaluation process should not apply a blanket cost/benefit criterion that ignores the higher costs of implementation in urban watersheds.

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 habitat restoration projects, and many of the strategies and projects identified in the plan will either directly or indirectly provide benefits to streamflow through 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.

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.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Mulvihill-Kuntz". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

Jason Mulvihill-Kuntz
WRIA 8 Salmon Recovery Manager