

Seattle Public Utilities

Overall, this rule lacks in detail compared to Ecology's Streamflow Restoration Grants Fiscal Year 2019 Interim Funding Guidelines issued June 2018. Those Guidelines have more helpful information, including a list of eligible applicants, what constitutes a successful proposal, and the scoring for application questions. Does Ecology intend to issue annual grant guidelines based on this rule? We hope so.

Detailed Comments:

Page 3, line 30: definition needs provide appropriate statute or WAC section to clarify that these are exempt from the water rights permitting process and the use must be below certain quantities.

Page 4, line 14 should reference section (4), not (3).

Page 4 or 5 – include the list of eligible applicants as appears on page 4 of the FY 19 Interim Grant Guidelines. Only stating who is ineligible is unclear.

Page 7, line 23: "Costs to develop a water right acquisition project" are excluded from funding. The meaning of this phrase isn't clear; it would help to provide examples by adding: "Examples include, but are not limited to,..."

Page 8, line 19, and Page 9, line 3: Funding for O&M should be identified by inserting the underlined text: "Describe how monitoring, operations, and maintenance will be addressed and funded to ensure benefits persist over time." Funding for monitoring and maintenance should also be identified under "173-566-230 – Riparian and fish habitat improvements." [Page 11, line 24, notes O&M costs as not eligible for funding by these grants.]

Page 9- Riparian and fish habitat improvements – clarify how a project will be evaluated for net benefits and under what conditions the benefits will be measured (current conditions vs climate change)