



Snohomish County

Public Works
Surface Water Management

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October 26, 2018

Department of Ecology
ATTN: Rebecca Inman
326 East D Street
Tacoma, WA 98421-1804

Dave Somers
County Executive

RE: Comments on the Streamflow Restoration Funding Rulemaking for Chapter 173-566

Dear Ms. Inman:

Thank you for the opportunity to comment on the draft language for the Streamflow Restoration Funding Rule. A large portion of Snohomish County falls in the Section 203 priority watershed for the Watershed Restoration and Enhancement (WRE) planning. Snohomish County also participates on the WRE Committee for WRIA's 7 and 8. Snohomish County Surface Water Management staff include many technical experts with knowledge/expertise evaluating stream/hydrologic conditions throughout Snohomish County. It is from this perspective that we offer the following comments.

Data Collection and Assessments: There is limited information/data related to the interactions between land use, withdrawals, and seasonal flows within naturally variable flow regimes. Funding data collection and assessments is critical to understanding those inter-relationships, prioritizing areas to focus projects work that will improve stream flow resources, and implementing streamflow restoration projects. As demonstrated by the interactive map of where the new law applies, watersheds state-wide are at varying levels of understanding and agreement related to impacts to instream flows and resources. While some watersheds have been collecting data and information to better inform streamflow restoration planning/project development, some watersheds have existing instream flow rules that were developed based on outdated data and assessments, and other watersheds have limited or no data about existing flow regimes. In order for project sponsors to propose projects with quantifiable metrics, the data collection and assessment work is essential to supplying those metrics (whether they are qualitative or quantitative). The critical importance of those data collection and assessment efforts is not captured in the funding guidelines. The interim funding guidelines should be updated to include funding for data collection and assessment to better inform project prioritization, design alternatives, and streamflow restoration project implementation.

Match Requirements: It is encouraging to see that there is no match requirement for these funds. Match, particularly for large capital projects, can deter/prohibit many project sponsors from applying for grants. We encourage the program to continue without a match requirement in future rounds. That said, we understand funding that can be leveraged to complete a project is compelling to funders and demonstrates project ownership by the sponsor. If match is a future requirement, we encourage Ecology to be very flexible about what can be counted as match and to keep the match requirement as minimal as possible.

Priority Subbasins & Regional Allocation: We understand that this is a statewide funding program and some effort has been made to prioritize watershed according to the 6091 legislation. To help project sponsors articulate net ecological benefit, it would be helpful to better understand how sub-basins are defined and prioritized. Section 173-566-150 discussed priority locations for funding at the watershed scale. However, there are areas of the watershed that have more impacts to instream resources than others and subbasins that are better suited to offset impacts than others. It would be helpful to project sponsors if those subbasins were prioritized or tiered so sponsors have a better understanding of how their problem/solution fit within the priority locations. Given the emphasis on priority watersheds in the legislation, it also might be worth considering a regional allocation for the priority watersheds and sub-basins.

Thank you for your consideration of these comments. If you have any questions, please contact Erik Stockdale, Snohomish County Surface Water Management Planning Manager, at 425-388-6684.

Sincerely,



Erik Stockdale
SWM Planning Manager
Snohomish County Surface Water Management