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Rebecca Inman
Department of Ecology
Water Resources Program
PO Box 47600
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March 15, 2019

Dear Ms. Inman,

The Puget Sound Partnership (“Partnership”) commends Ecology’s hard work to develop rules to implement the Streamflow Restoration program. We are pleased to submit the following comments on the proposed Streamflow Restoration Funding rulemaking—WAC 173-566.

Alignment of Programs

Strong alignment exists between Ecology’s Streamflow Restoration Funding program and the Partnership’s efforts to develop and implement the Action Agenda for Puget Sound. The 2018-2022 Action Agenda recognizes that low flows are a major limiting factor for salmon recovery and includes strategies and priority actions designed to help ensure sufficient instream flow in Puget Sound watersheds to maintain and recover salmon populations.

Suggested Amendment to Proposed Rules

The Partnership offers one suggestion for improvement on the proposed rules. This suggestion relates to section WAC 173-566-020(7), which currently states:

Puget Sound Action Agenda. Ecology may not fund projects designed to address the restoration of Puget Sound that are in conflict with the action agenda developed by the Puget Sound Partnership under RCW 90.71.310.

In addition to not funding projects in conflict with the Action Agenda, the Partnership suggests an amendment to the proposed rules that call for Ecology to consider—and potentially give priority to—actions that are included in the Action Agenda for Puget Sound. This consideration is similar to those that Ecology is currently required to provide when making decisions for other funding programs.¹

The Partnership believes that providing additional consideration for actions that are included in the Action Agenda is justified due to the previously stated alignment of our programs, and to the rigor with which actions are vetted by local and regional experts prior to inclusion in the Action Agenda. For example, each action included in the 2018-2022 Action Agenda was developed through a robust process that required coordination with local recovery organizations and alignment with local and regional recovery plans and priorities. Additionally, each action was subsequently reviewed and tiered by local

¹ See, e.g., RCW 90.50A.080 (Water Pollution Control Revolving Fund); RCW 70.146.070 (grants or loans for water pollution control facilities).

and regional experts based on standard criteria relating to the action's contribution to recovery and their implementation readiness. This collaborative and science-informed work received contributions from hundreds of individuals representing watershed, marine resource, and salmon recovery groups; federal, state, local, and tribal governments; non-profits; businesses; educational organizations; and private citizens. The Partnership also recognizes, however, that the geographic scope of the Streamflow Restoration Funding program extends beyond Puget Sound.

With these considerations in mind, the Partnership offers the following suggested amendment to WAC 173-566-020(7) (additions in italics):

Puget Sound Action Agenda. Ecology may not fund projects designed to address the restoration of Puget Sound that are in conflict with the action agenda developed by the Puget Sound Partnership under RCW 90.71.310. *Additionally, for projects submitted in WRIAs 1 through 19 (the Puget Sound basin), Ecology shall give priority consideration to projects that are referenced in the action agenda.*

The Partnership believes this language provides latitude to Ecology to define how to provide priority consideration in future iterations of the program's funding guidelines.

Suggested Considerations for Future Funding Guidelines

The Partnership also suggests the following considerations for future iterations of the program funding guidelines.

- ECY could encourage or require that applicants coordinate with the relevant Local Integrating Organization (Puget Sound only) and/or Lead Entity to ensure consistency with local priorities.
- ECY could encourage or require that applicants include in their project submittal a discussion of how the project is consistent with the relevant Local Integrating Organization ecosystem recovery plan (Puget Sound only) and/or regional and watershed salmon recovery plan.

The Partnership thanks you for considering these suggestions, and looks forward to successful implementation of the Streamflow Restoration Funding program in the coming years.

Sincerely,



Laura Blackmore
Deputy Director

Cc: Sheida Sahandy, Executive Director
Jay Manning, Leadership Council Chair
Stephanie Solien, Leadership Council Vice-Chair
Heather Bartlett, Water Quality Program Manager, Ecology