Seattle Public Utilities Staff Comments on Ecology's Proposed Rulemaking Chapter 173-566 WAC on Streamflow Restoration Funding March 14, 2019

WAC 173-566-120 Application page 4

(3) We support grant funding for feasibility studies.

(6) We support accepting applications for projects not funded in a previous cycle.

WAC 173-566-130 Phasing page 5

(1) We support funding projects in phases.

WAC 173-566-140 Evaluation Process page 5

The evaluation process looks reasonable.

(3)(b)(ii) Related to long-term sustainability, add that the applicant should demonstrate the ability to cover any ongoing costs to operate, maintain and monitor projects.

WAC 173-566-150 Funding Priorities page 6

(3)(a) and (b) We support this language. We also want to make sure that projects that are needed for the permit exempt wells get implemented so this issue doesn't linger.

WAC 173-566-220 Altered water management or infrastructure page 6

(1) Please insert in the list of examples "water system consolidations, extension of existing public water systems" between "source switches" and "and other irrigation efficiencies".

WAC 173-566 240 Environmental monitoring page 7

We support including monitoring equipment and effectiveness monitoring as eligible for funding. This will be very helpful.

WAC 173-566-300 Fiscal Controls

(2) We support the potential need to set aside a percentage of funds for each Ecology region or geographical area.

WAC 173-566-310 Ineligible projects and costs.

(4) As currently worded there is a double negative, and it doesn't match the phrasing in the rest of the list. We suggest changing this to: "Staff time not directly related to the project."