

## Thomas Pors

These comments are submitted on behalf of pilot project applicants City of Sumner and City of Port Orchard.

Pages 13-14 of the draft Final Guidance (section 4.1) describes elements of the NEB analyses for Pilot Project Proposals. The list of elements is not problematic but it lacks description of required analytical methods. Appendix C cites to two formalized analytical methods as examples: Habitat Equivalency Analysis (HEA) and PHABSIM. PHABSIM is especially data intensive and is not expected to be an effective analytical tool when comparing small flow reductions in large river systems. Ecology should add language to the draft Final guidance document and/or to Appendix C to more clearly state that alternative analytical frameworks to HEA and PHABSIM are acceptable. A well-documented analytical framework to account for equivalencies between flow depletion and habitat should be allowed.