

HDR and Anchor QEA

See attached comments

Comments to Draft Final Guidance for Determining Net Ecological Benefit

Comments by Chad Wiseman (HDR, Inc)

- Consider defining “steady state” in the definitions or at first use.
- Water Rights Acquisitions: Recommend clarifying if there are any other WR acquisition mechanisms other than through Ecology’s Trust Water Rights Program.
- It seems like offset projects in time and place (i.e. same subbasin) may not be “high priority” if they are of low value and offset projects in different subbasin (relative to impacts) may be a “high priority”, if it is of a high value, overall to the WRIA.
- More clarity on how to allocate consumptive water use impacts to a stream or multiple streams, or if consumptive use should just be accounted for as an impact at the subbasin spatial scale.
- A 1:1 ratio for water offsets is defined, but gives local planning units flexibility to provide more offsets. Consider providing some guidance or examples on why more offsets would be needed and how to scale those additional offsets. Examples?

Comments by Michelle Havey and Larissa Rohrbach (Anchor QEA)

- If a WRIA is able to mitigate entirely using water for water, do they even need to conduct an NEB?
- How will Ecology assess the timing of new consumptive water use impacts and the timing of offset project benefits?
 - There is no mention of time accounting with respect to completing mitigation offset projects prior to new wells coming online in the planning horizon
 - In a HEA framework, benefits now are more valuable than benefits in the future - how will that be assessed/weighed by Ecology?
- How should climate change be incorporated in the NEB evaluation, and how will climate change be assessed by Ecology?
- Should NEB be estimated for benefits acquired only during the 20-year planning horizon, or in perpetuity?
- Adaptive management is mentioned, but that requires long-term monitoring. How will long-term monitoring and any necessary adaptive management actions be accounted for in this NEB evaluation now? Who is responsible for the adaptive management?
- The preface to Appendix C indicates that HEA is not compatible with the Chapter 90.94 planning process due to lack of pre-impact monitoring data. However, HEA is often used now with assumptions using available data about the pre-impact and post-impact condition, which are typically agreed upon by a technical committee.
 - HEA provides a framework for assessing the time-value of impacts and benefits; it also allows for comparison of instream value lost as a result of new consumptive water use to out-of-kind mitigation benefits in equivalent terms.