September 6, 2019

Rebecca Inman
Department of Ecology
Water Resources Program
PO Box 47600
Olympia WA 98504-7600

Dear Ms. Inman:

The Snoqualmie Watershed Forum and our partners have been working to restore watershed health and recover Chinook and other salmonids in the Snohomish River Basin for almost 20 years. We appreciate this opportunity to comment on the Draft *Streamflow Restoration Competitive Grants Guidance for Project Applicants*.

The Snoqualmie Watershed Forum (Forum) is a partnership that supports salmon recovery and ecological health in the Snoqualmie and South Fork Skykomish Watersheds (spanning the King County portion of the Snohomish River basin, also called Water Resource Inventory Area 7). Member governments include King County, the Snoqualmie Tribe, Tulalip Tribes, the cities of Carnation, Duvall, North Bend and Snoqualmie, and the Town of Skykomish. Since 1999, the Forum committees, comprised of elected officials, citizens and representatives from conservation organizations, have been working collaboratively to improve conditions for salmonids. The Forum and our partners have collectively invested over $46 million in recovery actions, including investments in habitat protection and restoration, education, and scientific monitoring. We continuously evaluate our progress and update our priorities, and have made significant strides in improving habitat conditions for Chinook salmon and other salmonids.

Because the Streamflow Restoration Grant program has the potential to strongly influence the future health of the waters in the basin, the Snoqualmie Watershed Forum respectfully offers the following comments on the Draft Guidance:

Chapter 1: Critical grant funding considerations
- Please include criteria that prioritizes projects that do not impede, and in fact enhance, natural processes in rivers and streams. Engineered solutions will be more expensive, will require more habitat destruction for maintenance roads and infrastructure, will require ongoing operations and maintenance costs, and future decommissioning costs will be expensive. Actions like purchasing water rights or removing or setting back levees to reconnect floodplains should be prioritized.

Chapter 2: Application considerations for project types
- Surface storage: new, human-made dams intended to pond water of streams should not be funded by this program. Impacts of such dams include immediate loss of riparian habitats and trees, water temperature increases or changes in downstream systems, fish barriers, disruption of sediment delivery downstream, pathways for invasive plants and animals, potential for colonization by predatory warm-water species such as non-native bass and bullfrogs, loss of higher habitat-forming flows, and high cost relative to the instream flow benefits, among others.

- Watershed function, riparian and fish habitat improvement
    - o The first paragraph states "Projects of this type generally do not increase streamflow, but do benefit instream resources, and are therefore eligible, however they will tend to be less competitive within this grant program." But in fact, some of the actions listed in this section could increase streamflow and help restore natural hydrologic regimes, contrary to that statement. For example, it is well-known that impervious surfaces cause water to run off quickly rather than infiltrate, which causes streamflow during rain events to increase very quickly, and summer low flows to be lower than pre-development. Removing impervious surfaces would have a similar effect on streamflow to creating surface storage. Removal of impervious surfaces should not be limited to riparian areas only.
    - o *Strategic land acquisition* should also include purchasing old growth forests for protection and other lands in active forest management for protection or to convert to selective logging or harvest rotations of 150 years or longer. Recent research shows that old forests use much less water than young forests, and maintaining older forests can increase summer streamflow.
    - o *Levee modification* - also include *levee or revetment removal*.
    - o *Beaver introduction* - also include building beaver analogs or structures that encourage beavers to build dams by creating structures to support dam building, adding wood for dam materials, and otherwise attracting beavers.

Chapter 3: Applying for Funding – Scoring Criteria
- 1.3 – project improves streamflows or enhances instream resources to benefit threatened and endangered salmonids – consider adding to the criteria a list of the types of projects that are expected to improve streamflows (water rights, infiltration, removing impervious surfaces, increasing forest harvest rotation, protecting old or old growth forests, etc.) so that scoring is consistent between reviewers.
- 3.2 – project is an effective use of funds – suggest a larger point spread for this category. Suggest giving fewer points to projects that have strong evidence that the project would provide benefits for high relative cost (2 points instead of 4 points).
- 3.3 – suggest changing the wording of the categories for whether funding is secured to be less ambiguous. Instead of using "strong evidence" and "some evidence," award 10 points for those that have secured funding to complete the project plus operations and maintenance, and 5 points for those that have identified funding and are likely to have it awarded for the entire project or have secured funding for only part of the project.

Thank you for this opportunity to comment on the draft guidelines. Please direct any questions to Elissa Ostergaard at (206) 477-4792 or elissa.ostergaard@kingcounty.gov.

Sincerely,

Cindy Spiry - Forum Chair   Henry Sladek – Forum Vice-Chair
Snoqualmie Tribe ENR   Town of Skykomish Councilmember

cc: Snoqualmie Watershed Forum
         Elissa Ostergaard, Snoqualmie Salmon Recovery Manager
         Gretchen Glaub, Lead Entity Coordinator, Snohomish Basin (WRIA 7)