Seattle Public Utilities

Seattle Comments on Ecology Streamflow Restoration Competitive Grants Guidance
September 5, 2019

Overall comments
On the whole, the Grants Guidance does a good job of addressing factors that should be covered for an effective competitive grants program. We have recommended some changes and clarifications, particularly in the project types descriptions, as well as a few grammatical edits in a few sections.

Overall editing comment
Cross references to page numbers and appendices in the index and elsewhere in the document need to be double-checked for accuracy.

Chapter 1 Overview

Critical grant funding considerations
• We support the priority considerations (bullet 5 p.3).
• We particularly support adaptive management, tailoring to local site conditions, and aligning with the salmon recovery plans (bullets 1-3 p.4) as being important for successful projects.
• Sustainable projects (bullet 4, p.4): second sentence should read "Project benefits" instead of "Projects benefits".
• We support phasing of projects for grant funding (bullet 8, p.4) as being a realistic approach.
• Sources of additional funding (bullet 5, p.4): we support identifying other funding sources, but please add "estimates" before "operation and maintenance costs" as it's difficult to know exact costs if the project has not yet been designed.

Completing an application
• The title does not accurately reflect the content of this section. Better titles would be: "Key points for your application" or Guidelines for your application".
• Under demonstrating that the project is well-thought out (bullet 6): replace "Demonstrate that" with "Explain how ".

Eligible applicants
• Reference to March 31 in second paragraph is unclear: we recommend deleting "that have been" to clarify that it's for the proposals submitted, not Ecology's evaluation.

Chapter 2: Application considerations for project types

Water Right Acquisitions
• Definition: It may be possible for an applicant to procure a permanent water release for instream flow and transfer to the Trust Water Rights program without acquiring a water right.
• Definition: reference to RCW 90.03.380 unclear. 90.38.020 may be more applicable.
• Other Information: 2nd paragraph: "Ecology will provide payment for title to the water right, following the change in purpose, so that it can be held and managed in the Trust Water Rights Program." Not clear whether payment for title to the right would be made as part of this Streamflow Restoration funding, or separately. Recommend clarifying.
• Pre-Application meeting details, Appendix B: Recommend including water right

permit/certificate #.

Water Storage
• Definition: Because all MAR project proposals will be required to include a feasibility study, WQ testing, phased approach, etc., the definitions section could be improved to avoid confusion. Only Bullet 2 defines MAR, yet Bullets 1 & 3 also include MARs:
o Bullet 1 (Surface Storage) references lined and unlined surface storage; the latter is a type of MAR.
o Bullet 3 (Infiltration Galleries or Ponds) description is essentially the same as the unlined pond referenced in Bullet #1. Infiltration galleries and unlined ponds are essentially types of MARs.
o The water storage projects listed in the definition section are basically: MARs (aquifer recharge), Surface Water Retention (lined reservoirs/ponds), and Cisterns.
• A Quality Assurance Project Plan (QAPP) is mentioned (bottom of p.9) but it isn't clear how this statement links into the project. If it is a requirement of MAR projects, that should be stated.
• Additionally, a QUAPP should be a requirement of the Environmental Monitoring projects (p. 12).

Altered water management or infrastructure
• As written, the guidance doesn't explicitly state that watermain extensions and connections to an existing water system would be eligible for funding. Examples are given for "altered water management or infrastructure" projects in the WAC and guidance but is not necessarily the exhaustive list.
• We recommend that eligible "altered water management or infrastructure" projects should also include watermain extensions that convey water from an existing Group A public water system to one or more properties in lieu of using a water right permit-exempt well(s), when identified in a watershed plan adopted under RCW 90.94.020 or 90.94.030 and included in an approved water system plan of the Group A public water system. These types of projects may be a cost-effective solution for a WRIA or sub-basin in a WRIA, as determined by the alternative analysis in the watershed plan.

Watershed function, riparian and fish habitat improvement
We recommend Ecology encourage linking habitat improvements to water storage benefits instead of stating these projects do not "generally increase streamflow." This is an opportunity to encourage multiple-benefit types of projects, which is something supported by WRIAs 7, 8 and 9, as well as other jurisdictions.
A few potential ways to achieve some hydrologic benefits with such projects are:
• Acquisition of parcels that would otherwise be sub-developed with new homes, leading to removal/decommissioning of permit-exempt wells on those parcels and prevention of additional permit-exempt wells.
• Connectivity to previously disconnected hyporheic zones through creation of new side channels.
• Other habitat improvements that slow flows or make contributions to shallow aquifer storage. These projects are declared "less competitive within this grant program"; however Ecology will likely receive many such applications. We recommend habitat projects that include hydrologic elements be encouraged, and ranked higher than those that do not.

Environmental Monitoring
• Application requirements p.12: if a habitat improvement project is seeking environmental monitoring funding to demonstrate whether there is a measurable water storage benefit then we believe it should be considered competitive for this funding.

Select ineligible project elements:
Clarify whether or not mitigation projects are eligible for funding. Typically these are not included in grant programs.