

WRIA 9

Eligible Project Comments

- **Water Storage Projects:** All proposed water storage projects should not inadvertently contribute to adverse ecological impacts (project-specific or cumulative impacts). Potential concerns include (1) flow modifications that limit juvenile access to critically needed rearing habitats or impede habitat forming flows; (2) creation of additional fish barriers; (3) degrading riparian habitat; and (4) elevating instream temperatures. Stream flows in 2019 were such that many rearing habitats were rarely accessible during the juvenile chinook rearing period. Climate modelling indicates these lower flows may become frequent in the Green/Duwamish Watershed.
- **Watershed Function, Riparian, and Fish Habitat Improvement:** Suggest removing statement that these projects generally do not benefit flows. Habitat projects (e.g., levee setbacks, wetland restoration, and revegetation) can enhance natural water storage and hyporheic exchange to provide meaningful benefits to summer flows. Additional research may be necessary to quantify associated flow benefits with most of these project types.

Scoring Criteria Comments

- **General Scoring Criteria:** Proposed scoring criteria generally provide a reasonable approach to advancing streamflow restoration as directed by RCW 90.94.
- **Criteria 1.3:** Suggest modifying criteria descriptions of a, b and c to include both strength of evidence and magnitude of impact. This will improve project separation during scoring.
- **Criteria 2:** Chapter 90.94 RCW (2018) directed Ecology to "implement a program to restore and enhance streamflows by fulfilling obligations under this act to develop and implement plans to restore streamflows to levels necessary to support robust, healthy, and sustainable salmon populations." Suggest modifying 2.1 to reflect link between project proposal and priority stressor linked to instream flows and/or salmon recovery. As written, it is vague and subject to considerable interpretation. Suggest modifying 2.2 to provide clear examples of the types of planning documents Ecology will be looking for consistency with. As drafted, this is vague and subject to interpretation.
- **Criteria 4.4:** Suggest modification of criteria to capture the degree to which uncertainties/risks have been mitigated – not simply identified.
- **Criteria 4.5:** Suggest modifying criteria to reflect the extent to which project design enhances – as opposed to considers – ecological resiliency to climate change.