

Thurston County

Hello,

Thank you for the opportunity to comment on the Streamflow Restoration Competitive Grants Guidance for Project Applicants – Draft for Public Comment. Please see the following comments from Thurston County staff:

- Pg. 7: Please clarify how soon a pre-application meeting should be held prior to applying for the grant.
- Pg. 27: Climate Change -While relevant information is provided for studies and citations that the applicant can provide, there is a lack of guidance from existing practices. Please provide examples on some known methods to address future changes.
- Pg. 9 & 10: The differences between Water Storage and Altered Water Management or Infrastructure are not clear. As an example, what would a project be considered if a ditch was removed to allow flooding on private property? What if it created a wetland? What if it infiltrated?
- Appendix B and D seem to be switched in several areas. They are shown in the Table of Contents, but incorrectly referenced on pages 3, 6, 7, and 11.
- Pg. 6: Projects identified to involve the use or acquisition of private property require an acknowledgment form in several different project types. The table for Specific requirements by project type only identifies this as a requirement under Watershed function, riparian and fish habitat improvements. Please clearly identify this as a requirement for multiple project types.
- Pg. 8: Water Storage – does this type of project include a seasonal channel dam?
- Pg. 13: "Select Ineligible Project Elements, Projects that are otherwise required under statute, rule, ordinance, or court order, except pursuant to chapter 90.94 RCW." – This section is concerning because an ordinance is very broad and is often used to enact a decision that the jurisdiction has made. Thurston County has made progressive efforts in the past to go beyond minimum requirements, and preventing projects required by an ordinance that the county chose to enact, punishes those progressive past efforts. Please consider changing the verbiage provided to remove "ordinance", or at least specify that it does not include ordinances that go beyond minimum requirements.
- Pg. 8: Please consider including additional project types under water storage, like beaver reintroduction. There is enough information to support these projects and the applicants will still be required to provide data that quantifies it.
- The Table of Contents does not accurately reflect all page numbers for the associated chapters.
- Pg. 10: Watershed function riparian and fish habitat improvements: Please consider adjusting the statement "Projects of this type generally do not increase streamflow..", to something that identifies the projects as generally producing less direct increase streamflow compared to those projects previously mentioned.
- Pg. 30: Determination of operation and maintenance (O&M) costs – Please clarify here that this does not include the requirement to secure funding sources of monitoring and data analysis, since those are usually included as a part of operation and maintenance.
- Pg. 14 – 23: Point scoring
 - o Consider allocating a much higher point value to instream resource improvement, to prioritize this further over secondary considerations.
 - o The point values are step functions. Consider changing this to add multipliers weighted to specific components of what are the favorable characteristics and criteria of the project. Take a look at

wetland rating system for Western Washington for a scoring method where questions are answered for a point total which are then put into h, m, l buckets and then combined for an overall score. This could be converted for the scoring methodology for the grants easily.

<https://fortress.wa.gov/ecy/publications/parts/1406029part1.pdf>

- o Additional considerations – Is there time available to outline additional concerns prior to final scoring?
- o Consider providing a scoring criterion that prioritizes local jurisdictions and organizations over state agencies.
- o Consider a phasing of ranking the projects, to allow an initial ranking which id's projects and generates interest, and then can be funded for the feasibility study, then providing another round of ranking for a final list of funded projects.
- o Provide definitions for the subjective terms used in the scoring criteria. (Strong, some, minimal – low reasonable, high – sustainable, feasible – etc.)

Thank you,
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Thurston County