

## MUCKLESHOOT INDIAN TRIBE

### COMMENTS ON STREAMFLOW RESTORATION COMPETITIVE GRANTS Draft Aug 8, 2019

Will Ecology develop criteria for every award cycle or will this document be in force until changed?

#### Water Right Acquisitions

Should include statements that the regular water right change requirements must be met – i.e., that Ecology must make a tentative determination of validity for the right or portion of the right allocated to the Trust Program. It needs to be real water that will actually benefit streamflows.

#### Water Storage

MAR is a highly speculative option in western Washington with no certainty about when, where, or how much benefit to streamflow will be realized. The narrative here portrays MAR in an overly-optimistic manner. More caveats and cautious language needs to be included in the criteria. We know from both the Sammamish Plateau and the Highline/Seattle Wellfield ASR projects and results that recharge water quickly leaks out and is not stored anyway long enough to discharge to surface water months later.

#### Altered Water Management

Instream flow benefits for these type of projects are very case specific. Tightlines reduce waste, but leaks can also help recharge groundwater. It is crucial that the affected Indian Tribe be involved in deciding the suitability of a proposed project. We agree that any saved water is conveyed to Ecology under the trust Program; otherwise it is a waste-reducing or efficiency measure that should already be occurring.

Reclaimed water should be included as a source exchange should be included in the examples.

#### Watershed function

Add: restore side channel habitat for rearing and over-wintering refuge for juvenile fish. This is especially important in medium and large rivers.

Add: Importance of adding or protecting existing shade trees in the riparian area to address temperature problems.

Ecology should consult with the affected Indian Tribe on the suitability of culvert removal projects.

Strategic land acquisition – would purchasing development rights qualify for funding?

The score should be higher for projects located in 90.94 WRIAs. Anticipate that as plans are developed and approved, this ranking should increase substantially. 15 points seems low compared to some of the other, less important criteria.

Project Benefits 2.2 – Need clarification on what is meant by “needs of the community”. This implies that community plans implementation is a key component when the goals have little to do with salmon restoration. The 15 point score is too high; i.e., it rates the same as having an approved plan by Ecology, which in our view is more important and would already be approved by key stakeholders.

Project Budget: Ecology should give consideration to the fact that projects in the Puget Sound Region, for example, will be considerably higher than other areas of the state.