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**Comments Re: “Streamflow Restoration Competitive Grants”  
Publications 19-11-078**

Thank you for the opportunity to comment on this draft of the Streamflow Restoration Competitive Grants. I am submitting these comments as an individual, so they are not specifically endorsed by the groups I manage. As an individual, I am drawing on four years of experience I have gained as manager of both our Planning Unit (Chehalis Basin Partnership), and our Lead Entity for salmon recovery in the Chehalis Basin (Chehalis Basins Lead Entity).

**General Recommendations for Project Review Process:**

- Please consider adding project review members from outside of Ecology. These projects are by nature interdisciplinary and complex. Applying a diversity of perspectives to evaluate the projects will improve evaluation, and the projects themselves.
- Allow for a list of “alternate” projects in case any of the approved projects fall through for any reason.

**Specific Recommendations on Guidance Document**

- On Page 15, Criteria 1.3 - Consider adding a category so that the sponsor can receive points for non-listed salmonids. Currently, points are only given for listed salmonids (“threatened” or “endangered”) or non-salmon species. The criteria does not appear to provide additional points for a project benefiting a salmonid population that is not listed. Salmonid stocks in systems threatened by low streamflow could become listed if their habitat conditions are further degraded. Chehalis Spring Chinook are a very good example of this. Projects to improve streamflows in those systems should be incentivized. At minimum, for greater clarity, provide a list of which salmonid populations, ESUs, stocks, etc. qualify for additional points in 1.3b. If you cannot implement any of the above recommendations, please add a section to the guidance narrative stating that only “threatened and endangered” salmonids are called out in the legislation, so that non-listed species cannot receive additional points in this funding program.
- Page 16 – Also provide clarity on which species, stocks, ESU, etc. qualify for receiving points in this category.
- Page 16- What are “other environmental considerations”? Do non-listed salmonids fit in that category?
- On Page 4, under “completing an application” – provide a bullet for every criteria projects are evaluated on. This list presented here seems to cover the criteria, but not comprehensively. Either make it comprehensive or not redundant at all, for clarity.

- On Page 8, under “surface storage” – please indicate if there would be any size limit to an acceptable “reservoir or pond.”
- Consider adding an opportunity for reviewers to talk to the project sponsors or visit the project site. Much more information can be gleaned about a project from those opportunities than through a written application.

### **Specific Recommendations for Criteria:**

Over the past 4 years, our Lead Entity Review Team has gone through many iterations of improving our Salmon Recovery Funding Board (SRFB) project ranking criteria. My suggestions here are based on those best practices and lessons learned.

- The Scoring Criteria section could be much clearer if the scores were presented differently. Please make it clear that a range of scores can be applied to each category, for instance, from 0-30 points available, rather than just 0 or 30 points. This will allow for greater dispersion of scores.
- Having just one place to write “Earned” out of “Possible” per criteria will be much clearer. For example, in 1.3a, have the criteria then have a space for 30 possible, then one space for “Earned.” Ditch the 15 and 0.
- The Scoring Criteria section would be clearer if the criteria were expressed as questions instead of statements. For example, in 1.3, change: “Applicant provided one from each of the groupings below” to *“Does the application provide strong evidence that the project will improve streamflows?”* and then indicate from 0-30 points available. As another example, for 4.2, make it a question: *“Does the proposal provide strong evidence that the proposal is feasible and likely to succeed?”* This allows a full range of points to be applied. Reviewers know that if the answer is “no” or, “yes, but the evidence is weak” then no or low points will be awarded. This does not need to be spelled out.
- Page 16, Criteria 2.2, Separate out the categories. Provide one set of points for meeting community needs and another set of points for aligning with watershed plans. I would also suggest adding a set of points for “aligns with the local salmon recovery plan.”
- Page 17, Criteria 3.2. Reviewers working at a statewide level will not know what “reasonably low” costs are for all projects. Include clarifying wording here. I suggest the wording: “reasonable cost comparable to similar projects in a similar part of the state.”
- Criteria 6.1. Considering the importance of local support for a project to succeed, consider increasing points allocated to this category. Also consider additional nuances to what you are requesting from applicants. Consider the quality of the stakeholder giving the support (are they really familiar with the project details? Would they really be affected by the project? Are they willing to contribute to the project to ensure its success?) Also consider lack of support and what it would mean to the project. How will this criteria gauge lack of support? Consider crafting a criterion to ensure the sponsor identifies any possible local opposition to the project and how they will address any concerns that come up in the life of the project.

### **Additional Specific Criteria Recommendations.**

- Criteria 3.3. Consider that you are not asking for match funding. If so, why are you asking for certainty of funding?
- Criteria 4.1. The words “local potential” are not commonly used. Please define what you mean. This question appears to assume that you are expecting that a known practice will be applied in many different locations. Consider that many applications you receive will actually be developed by local entities, so stating that they need to be adapted to local conditions is less relevant. Please reconsider how to better state what you want the proposal to do here.
- Criteria 5.3. This criteria does not seem relevant to evaluating the project’s benefit to the resource or likelihood of success. Provide a mechanism for Ecology to check in on the project and make sure that it is achieving its benefits after completion, instead.

### **Appendix C**

Consider rethinking the category of “community and watershed planning”. Consider breaking this into two or three components: “salmon recovery plans,” “watershed plans,” and possibly also “community plans.” All WRIA should have a salmon recovery plan in place. Ask the applicants to reference that plan specifically. To meet your goals from “Appendix C” – consider asking for a letter of support from the local Lead Entity demonstrating that the project is in line with its goals. Some watersheds have approved Watershed Plans already in place. Specifically ask the sponsor to reference those plans in their application. For “community planning,” give some examples to applicants. Refer the applicant to local Critical Areas Ordinances, Voluntary Stewardship Program plans, etc.

The “partner and stakeholder engagement” section is good. I like how you ask the sponsor to talk to specific groups that the project may affect. You might be interested in taking a look at the Floodplains by Design guidance, which includes in “Elements of a Successful Proposal” wording like: “if your project impacts agricultural land, document a robust stakeholder process that involves the agricultural community, including, but not limited to, letters of support from landowners in the project area.”

Thank you for your hard work developing this grant program guidance, and for considering these comments.

Sincerely,

*Kirsten Harma*