

To: Recreation and Conservation Office

From: Tristan Weiss, Streamflow Restoration Ecologist, WDFW
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Date: October 3, 2023

Re: WRIA 14 and 15 technical comments on SRFB's *Watershed Restoration and Enhancement Plan Review Report*

Washington Department of Fish and Wildlife's (WDFW) comments primarily address the Salmon Recovery Funding Board's (SRFB) review panel's analysis of the WRIA 14 and 15 Watershed Restoration and Enhancement Committees (WREC) plans. WDFW voted not to approve these plans during the original WREC planning process. We stand by our voting decisions and maintain our comments made about these plans at that time. We offer our comments here to provide further context for our perspective and to aid the SRFB in providing recommendations to Ecology that encourage the adoption of plans that support robust, healthy, and sustainable salmon populations.

Consumptive use

- We agree with the panel's findings that consumptive use estimates were consistently applied across WRIAs. We also support the finding that summer consumptive uses should be provided in more detail.
- In addition, we believe that the use of one sample size across all WRIAs to estimate outdoor irrigated acreage, regardless of the projected number of new wells in the WRIA, increases uncertainty of the outdoor irrigated acreage estimate and undermines confidence in the final projected consumptive use value and sufficiency of offset actions.

Water Offsets

- We agree with the review panel's findings regarding the uncertainties surrounding stream augmentation supplied by groundwater and managed aquifer recharge (MAR) facilities supplied by surface water withdrawals. The panel's analysis aligns with our broader reluctance to rely on overly engineered, complex projects that are proposed as mitigation for new permit exempt well impacts in perpetuity.
- We also agree that the plans should seek to implement actions that address the root causes of stream degradation and avoid further hydrological manipulation of surface-groundwater systems.

Net Ecological Benefits

- We share the panel's observation that highly conceptual, impracticable, and unsponsored projects are less likely to be implemented and should be revised or removed from the plan as offset/habitat projects. However, in lieu of replacing projects that are more likely to achieve tangible offsets, we believe that remaining projects should be re-evaluated to determine if NEB can be achieved.
- The ecological impacts of new water withdrawals will be greater where aquifers are stressed by climate change. In consideration of climate change, the long-term viability of both water and habitat offset projects should be evaluated individually and cumulatively in the analysis of NEB.
- We agree with the panel's recognition that there is a lack of clarity around the use of forest protection projects in WRIA 15. We strongly support the use of forest protection as a strategy for improving watershed resilience and protecting aquifer health. We encourage the inclusion of forest protection in the plan; however, we believe that streamflow benefits should not be quantified given the short- and long-term uncertainty in the benefits.

We hope these comments help to inform the SRFB's technical recommendations to Ecology. The adoption of robust WRIA 14 and 15 WREC plans that support streamflows and salmon populations are necessary to meet the intent of RCW 90.94. We welcome future opportunities to discuss our comments in more detail or answer any questions you may have.

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