



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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April 23, 2021

Via Electronic Submission

WRIA 15 WREC
Attn: Stacy Vynne McKinstry
Department of Ecology
3190 160th Ave SE,
Bellevue, WA 98008

Re: Kitsap Watershed Restoration and Enhancement Plan

Dear Chair Vynne McKinstry:

The Washington Department of Fish and Wildlife (WDFW) appreciated the opportunity to participate on the Kitsap Watershed Restoration and Enhancement Committee (WRIA 15 WREC). Collaborative efforts like the WRIA 15 WREC are essential to identifying and implementing durable solutions to water availability issues in Washington. We applaud the work accomplished by the WRIA 15 WREC in identifying many promising proposals to benefit streamflows and habitat within the Kitsap watershed. However, there remains great uncertainty around the Kitsap Watershed Restoration and Enhancement Plan's ability to offset the consumptive use impacts of future domestic permit-exempt well development. These uncertainties are further amplified by the complexities inherent in interactions between surface and groundwater systems. The estimated offset target and the projected flow benefits leave such a margin for error that the plan may fail to maintain streamflows, let alone restore and enhance them. We therefore are unable to vote in support of the plan.

Our primary concerns are summarized below:

1. Consumptive use estimates. Estimating outdoor water use is a highly uncertain aspect of projecting future consumptive use impacts. As articulated throughout this planning process, we maintain our concerns that elements of the sampling design used to assess irrigated acreage risks unnecessarily increasing uncertainties in estimates of outdoor water use. The result of this limited design makes it difficult to know how much water will be intercepted by new permit-exempt wells and thus reduce streamflows. The planning process requires a reliable estimate of future consumptive use to develop an adequate offset portfolio of projects capable of replacing water. Therefore, uncertainty in the estimate of future impacts, though not impossible to overcome, requires a robust suite of projects to offset and replace the water lost to ensure the plan is resilient to these uncertainties.
2. Uncertainty related to the streamflow benefits. The pathways by which a given project contributes to streamflow are complex. Ensuring that many of the claimed streamflow

benefits described in the plan accrue during the critical flow period will require significant analysis beyond the extent conducted during this planning process. Currently, the plan relies on flow benefits from highly conceptual managed aquifer recharge projects and water right acquisitions that lack identified locations and specificity related to the timing of their anticipated benefits. The disproportionate reliance these conceptual water replacement projects makes it challenging to evaluate the plan's ability to successfully offset estimated impacts, particularly during critical flow periods.

3. The significant reliance on habitat-type projects to replace consumptive losses to streamflow. WDFW believes habitat restoration and enhancement projects are valuable tools to improve ecosystem and watershed function; however, we are very cautious to accept estimated streamflow contributions as a replacement for consumptive quantities of water in the absence of site specific validation and strong scientific consensus. The ability of habitat projects to contribute to streamflow is driven by many variables and difficult to predict.
4. Uncertainty related to implementation of the plan's components. Various aspects of project implementation carry additional uncertainty. Many projects appear to lack clear sponsors willing to pursue the necessary funding, permits, landowner agreements, or other crucial project development tasks necessary to ensure their implementation.
5. Failure of the plan to achieve offsets in each sub-basin. While WDFW understands the law only requires offsets to be achieved at the watershed scale, our staff have stressed the importance of achieving offsets within each sub-basin since the beginning of plan development. This is due to the unique life histories of fish populations that vary across sub-basins. Several of these populations are imperiled, including Hood Canal summer chum salmon and Puget Sound Chinook salmon and steelhead. Hood Canal summer chum salmon, for example, are a federally listed species particularly sensitive to streamflow issues, and WDFW is concerned that failure to achieve water offsets in Hood Canal sub-basins could threaten the potential de-listing of this species. WDFW also operates fish hatcheries that rely on adequate streamflow to produce fish for recreational, commercial, and conservation purposes. This includes Chinook salmon produced specifically as part of the state's Southern Resident Orca task force. WDFW is concerned that failure to achieve water offsets in each sub-basin could impact the productivity of these hatcheries and impact harvest opportunities and conservation initiatives.

We appreciate the effort, commitment, and collaborative spirit demonstrated by the WRIA 15 WREC members throughout this planning process. Many proposed projects promise considerable value towards watershed restoration in WRIA 15; we hope to see them implemented regardless of the status of the plan. We look forward to continued engagement with Kitsap watershed stakeholders as we work toward protecting, restoring, and enhancing streamflows and improving watershed function.

Sincerely,



Megan Kernan
Water Policy Section Manager