



# AGENDA

## WRIA 15 Watershed Restoration and Enhancement Committee Meeting

September 3, 2020 | 9:30 a.m.-2:30 p.m. | [WRIA 15 Committee Webpage](#)

### Location

WebEx Only  
(See instructions below)

### Committee Chair

Stacy Vynne  
Svyn461@ecy.wa.gov  
(425) 649-7114

### Handouts

- Agenda
- August Meeting Summary
- Discussion guides: Proposed Revisions to Draft Plan Chapters, Summary of Survey Results, Adaptive Management

### Welcome

9:30 a.m. | 5 minutes | Susan Gulick

### Meeting Agenda and August Meeting Summary

9:35 a.m. | 10 minutes | Susan Gulick

*Handouts: Agenda, August Meeting Summary*

### Updates and Announcements

9:45 a.m. | 10 minutes | Stacy Vynne, All

### Plan Development

9:55 a.m. | 60 minutes | Stacy Vynne, All | Discussion

*Handout: [Discussion Guide](#)*

- Overview and reminder of key components of the plan
- Review outstanding comments on Chapters 1 and 4
- Discussion
- Next steps

### Break

10:55 a.m. | 5 minutes | All

### Projects

11:00 a.m. | 90 minutes | Stacy Vynne, Susan Gulick, All | Discussion

- [Updates on water rights](#)
- [Updates on detailed project descriptions](#)
- [KPUD stream augmentation project](#)
  - Guidance on whether to include
- Other project updates
- Project recommendations
  - Any projects to further develop or remove?
- [Status of projects and offsets by subbasin](#)
  - Subbasins: Are impacts matched with offset projects?
  - Where do we need to do additional work?
  - Consumptive use estimates by subbasin
- Next steps

### Break

12:30 p.m. | 15 minutes | All

### Adaptive Management

12:45 p.m. | 30 minutes | Susan Gulick, All | Discussion

*Handout: [Discussion Guide \(coming soon\)](#)*

- Update from Working Group meeting
- Refine Adaptive Management components
- Discussion/Next Steps

## Policy Recommendations

1:15 p.m. | 60 minutes | Susan Gulick, All | Discussion

Handout: [Summary of Survey Results](#)

- Review survey results
- Review status of policy recommendations
  - General agreement to include
    - A04 Upgrade Well Reporting
  - General support for concept but need refinement
    - A05 Implementation Lead
    - A11 Durability of Implementation
    - A20 Monitoring and Research
    - A25 Salmon Recovery Portal
    - P46 Recycled Water
    - Water Conservation Education Program
    - Water Conservation Statewide Policy
  - Opposition to including
    - A14 South Sound Water Steward
    - A23 Water Supply Data for Comprehensive Water Planning
    - A26 County Planning Study Streamflow Restoration
    - P07 Plan Implementation Funding
    - P16 Drought Response Limit
    - P21 Adaptive Management Responses (See adaptive management proposal above)
    - P28 Hookup Incentives
    - P44 Permit Exempt Well Withdrawal Limits
    - P45 Instream Flow Rule and Trust Water Rights Program
    - P47 Water Laws
    - P48 Beaver Package
- Discussion and Next Steps

## Public Comment

2:15 p.m. | 5 minutes | Susan Gulick

## Next Steps and Action Items

2:20 p.m. | 10 minutes | Susan Gulick, Stacy Vynne

- Next meeting—Thursday, October 1, 2020, 9:30 a.m., Webex

**WRIA 15 Upcoming Meetings:** <https://ecy.box.com/v/WRIA15UpcomingMtgs>

### WebEx Information

#### **WRIA 15 Committee Meeting**

Meeting number: 133 922 8770

Password: WRIA15Comm

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## MEETING SUMMARY

### WRIA 15 Watershed Restoration and Enhancement

#### Committee Meeting

August 6, 2020 | 9:30 a.m. – 1:30 p.m. | [WRIA 15 Committee Webpage](#)

#### Location

WebEx

#### Committee Chair

Stacy Vynne McKinstry  
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(425) 649-7114

#### Handouts

- Agenda
- June & July Meeting Summaries
- Discussion Guides: Plan Development; Adaptive Management; Recommendations from Project Workgroup

## Attendance

### Committee Representatives and Alternates \*

Joel Purdy (*Kitsap Public Utility District*)  
David Winfrey (*Puyallup Tribe*)  
Stacy Vynne McKinstry (*WA Dept of Ecology*)  
Greg Rabourn (*King County*)  
Teresa Smith (*City of Bremerton*)  
Dave Ward (*Kitsap County*)  
Kathy Peters (*alternate - Kitsap County*)  
Zach Holt (*alternate - City of Port Orchard*)  
Joy Garitone (*Kitsap Conservation District*)  
Brittany Gordon (*WA Dept of Fish & Wildlife*)

Dan Cardwell (*Pierce County*)  
Dana Sarff (*alternate - Skokomish Tribe*)  
Seth Book (*alternate - Skokomish Tribe*)  
Paul Pickett (*alternate - Squaxin Island Tribe*)  
Randy Neatherlin (*Mason County*)  
Sam Phillips (*Port Gamble S'Klallam Tribe*)  
Mike Michael (*City of Bainbridge Island*)  
Dave Windom (*Mason County*)  
Nate Daniels (*Great Peninsula Conservancy*)  
Alison O'Sullivan (*Suquamish Tribe*)

### Other Attendees

Susan Gulick (*Sound Resolutions, Facilitator*)  
Angela Pietschmann (*Cascadia, Info Manager*)  
Bob Montgomery (*Anchor QEA*)  
Paulina Levy (*WA Dept of Ecology*)

Stephanie Potts (*WA Dept of Ecology*)  
John Covert (*WA Dept of Ecology*)  
Joel Massmann (*Suquamish Tribe*)  
Joe Hovenkotter (*King County*)

### Committee Representatives Not in Attendance\*

City of Gig Harbor  
City of Poulsbo  
Kitsap Building Association

Washington Water Service (*ex-officio*)  
Mason-Kitsap Farm Bureau (*ex-officio*)

*\*Attendees list is based on roll call and participants signed into WebEx.*

## Meeting Agenda, June and July Meeting Summaries, Updates, and Announcements

Susan reviewed the agenda. *No revisions to the agenda.*

Stacy reviewed requested changes to the June and July meeting summary drafts. *Summaries approved with changes.*

Stacy provided updates from Ecology:

- **Ecology staff are furloughed** 8/31, 9/4, 10/30, 11/30. Let Stacy know if your entity is experiencing furloughs or reduced capacity so she can track for Ecology management.
- Ecology staff have completed **streamflow grant evaluations**. Ecology leadership's evaluation is in progress and announcement of awards anticipated by October.
- Ecology has developed a [focus sheet](#) on the implications of the **Foster Decision** and the Foster Pilot Program.
- The **Project Workgroup** will meet on Monday, 8/10. Contact Stacy if you would like to attend. The workgroup will discuss water rights, detailed project descriptions, additional projects to develop, and refinement of project list.
- The **Beaver Task Force** met on Wednesday, 8/5 and prepared a recommendation package for committee consideration. Raw notes available [here](#). Draft language included in proposal survey.

## Operating Principles

The approved WRIA 15 Operating Principles state “the Committee may review the operating principles periodically. Any member of the Committee may bring forward a recommendation for an amendment to the operating principles. Amendments will be brought for discussion when a quorum (2/3 of the membership) is present and take effect only if decided on unanimously by the full Committee for inclusion in the operating principles.” Unanticipated circumstances have raised the need for the chair to bring forward a recommendation for amendments. Stacy presented draft language on remote participation, final approval of the plan, presumed withdrawal and resignation. The committee discussed revisions and agreed to the following language:

- **Remote participation.** If extraordinary events, such as a pandemic or natural disaster, require the committee to meet remotely, all meetings will be held remotely and the operating procedures will remain in force, except portions that assume in-person versus remote participation.
- **Final approval of plan.** The final plan approval may also be given verbally during a committee meeting or in writing outside of meetings when in person participation is not possible: Approve / Disapprove.
- **Removal from the Committee.** Entities must participate in the committee process after September 1, 2020 to retain membership on the committee. If an entity does not attend at least one committee or workgroup meeting over any three-month period it will be assumed they have withdrawn from the committee and will be removed as members, unless the member provides a written explanation and requests to remain on the committee. The Chair, via electronic communication, will inform any committee member who has not been participating for two months with this information to provide a minimum of one-month notice before removal.
- **Resignation.** If an entity no longer wishes to participate in the committee process or the final plan approval, they should send written notice (electronic or mailed notice) to the chair as early as possible prior to their resignation. Advance notice will support the chair and facilitator in managing consensus building and voting procedures.

### Reference Materials:

- [Discussion guide](#)

- [Revised and Approved WRIA 15 Operating Principles \(8/6/2020\)](#)

**Vote on amendments to Operating Principles:**

Entity	Representative	Vote
Kitsap County	Dave Ward	Approve
Mason County	Dave Windom	Approve
Puyallup Tribe	Dave Winfrey	Approve
Pierce County	Dan Cardwell	Approve
Skokomish Tribe	Dana Sarff	Approve
Squaxin Island Tribe	Paul Pickett	Approve
Suquamish Tribe	Alison O'Sullivan	Approve
City of Bremerton	Teresa Smith	Approve
Port Gamble S'Klallam Tribe	Sam Phillips	Approve
City of Port Orchard	Zach Holt	Approve
City of Bainbridge Island	Mike Michaels	Approve
Kitsap Public Utility District	Joel Purdy	Approve
WA Dept of Fish & Wildlife	Brittany Gordon	Approve
WA Dept of Ecology	Stacy Vynne	Approve
King County	Greg Rabourn	Approve
Kitsap Conservation District	Joy Garitone	Approve

## Plan Development

Ecology management has reviewed the committee's comments on WRE Plan Chapter 1: (1) they are considering incorporating some comments as they prepare the additional sections for Chapter 1; (2) they are deferring other comments back to the committee as deemed to be WRIA or committee specific. Some comments on **Chapters 1-3** will be discussed in the September committee meeting and will need support from other entities to prepare the language if the committee agrees to the revision. Other comments will be incorporated into the August WRE Plan Draft. Stacy will make the revisions to Chapters 1-3 that were sent out for committee review in the July. Stacy will provide a track changes and clean version of the chapters. .

**Chapter 4** was distributed to the Committee on 8/4 (comments due 8/20). It was based on the technical memo the committee worked on February-June and presents multiple growth projections and consumptive use calculation methodology.

Ecology is working to share the **draft plan** with the committee by 8/28. Stacy will keep the committee updated if there is a delay in distribution. The draft will show chapter structure and examples if WRIA 15 content is not yet ready (e.g., project descriptions, policy and adaptive management recommendations). The committee will have about a 3-week review window and will review initial comments during the 10/1 committee meeting. All committee members need to agree to the plan content, so it's important to work together on the revisions. The committee will go through a review process again in the fall with the **full plan**.

**Reference Materials:**

- [CH 1-3 draft](#)
- [CH 1-3 compiled comment tracker](#) [updated to reflect 8/6 discussion]
- [Chapter 4 draft and comment tracker](#)
- [Discussion guide](#)

#### Discussion of comments on Chapters 1-3 of draft plan:

- **Squaxin Island Tribe:** Insert information on all WRIA 15 streams that are 303d listed or have TMDLs completed, and the status of current TMDL studies and implementation plans. Also mention Ecology's south sound nutrient planning. Include a figure with a map of 303d and TMDL stream reaches.
  - **Ecology:** Ecology is concerned with extensive coverage of this topic as it goes beyond the scope of RCW 90.94.030 (unless considered for specific projects).
  - **Squaxin:** low flows affect water quality, relevant for plan. Include brief summary (i.e., a table of streams on the 303d list / TMDLs). Provide links to info on Ecology website.
  - **Kitsap County:** no objection; avoid including too much ancillary information (tie to NEB).
  - **Bainbridge Island:** include basic info on water quality issues but limit scope.
  - **Ecology** will include revision in WRE Plan Draft.
- **Squaxin Island Tribe:** Instead of: "The complexity, physiography and dominance of localized groundwater and surface water systems have resulted in the subdivision of WRIA 15 into many different hydrologic scales of subareas for different studies." Replace with: "Addressing the complexity of groundwater and surface water systems in WRIA 15 requires analysis at many different hydrologic scales depending on the needs of the studies."
  - **Mason County:** agree with plain language accessibility (reduce jargon).
  - No concerns expressed by committee.
- **Squaxin Island Tribe:** We should include a discussion of the flow duration method for setting instream flows in the document and compare it with habitat assessment methods (i.e., PHABSIM). Present and discuss the flow duration curves that Jim Pacheco developed.
  - **Squaxin:** Jim Pacheco created graphs that provide background information worth including in plan. Squaxin can provide a footnote on the dataset for the site they are monitoring. In plan section about water resources, provide additional context to explain how instream flows are set in rules (e.g., X method was used in the '80's but today we would use Y method).
  - **PGST:** tradeoffs between flow duration method vs hydro / habitat mode.
  - **Kitsap PUD:** ensure that Jim's graphs are accompanied by data caveats/considerations.
  - **Ecology** will include revision in WRE Plan Draft.
- **Squaxin Island Tribe:** The sentence starts with "East Kitsap drainages", but Coulter, Rocky, and Minter Creeks are south sound drainages. Since this section is about hydrology, create another subsection about salmon restoration needs, and organize it by lead entity areas.
  - **Ecology:** Stacy will discuss drainages with Bob. Ecology + tech consultants working to prepare an additional section on salmon recovery (e.g., species, usages, life history). Planning to include in Chapter 2 and in project chapter and NEB evaluation.
  - **Kitsap County** be clear when discussing Puget Sound drainages vs Hood Canal drainages. Don't want to lose sight that this work is driven by salmon; defer to plan editors on how to incorporate salmon (could fit in Chapter 2 or NEB chapter).
  - **Squaxin:** Consider specific context coming out of salmon planning in East Kitsap drainages.
- **Squaxin Island Tribe:** Suggest reviewing the [Northwest Climate Toolbox](#) for projections on the Kitsap peninsula.
  - **Squaxin:** University of Idaho's Climate Toolbox is very easy to use. Pull out a few temperature/precipitation projections for trends.
  - **PGST:** agree with this idea. Consider tableau tool from Climate Impacts Group (highest resolution downscaled data).

- **Mason County:** don't spend too much time quoting from one source as projections change frequently.
  - **Anchor QEA:** will review the Climate Toolbox to bolster this section; he recalls that the Climate Toolbox doesn't have a streamflow example (closest was Skokomish river) but will confirm.
- **Squaxin Island Tribe:** Add two more bullets to "Other considerations were": "alignment of subbasins with Tribal Usual and Accustomed (U&A) fishing areas"; and "adjustment of boundaries to take County jurisdictions into account"
  - **Ecology:** This chapter was developed from the committee approved subbasin technical memo; these considerations were not discussed in the memo.
  - **Mason County:** is not concerned about county jurisdictions as a consideration for subbasin delineation (headwaters in 1 county, consumptive use in another). U&A seems immaterial to outlining subbasins, which were defined by flows and geography with input from tribes.
  - **Kitsap County:** does not recall considering U&As or county jurisdictions as part of subbasin delineation on this committee.
  - **PGST:** need to put more thought into this; tribal U&A fishing areas are a red flag for Tribe.
  - **Squaxin:** U&A was definitely a consideration for tribes in delineating subbasins and they do align; for example, the South Sound subbasins align with U&A. Less concerned with county considerations, but Pierce County did not want to split Gig Harbor Peninsula between subbasins.
  - **Ecology:** suggest adding a sentence that acknowledges some members considered U&A + county jurisdictions in their deliberation and consideration of subbasins, but without implying the full committee was aware of these considerations.
  - **Kitsap County:** more comfortable with this framing.
  - **Squaxin:** Likes this suggestion.
  - **Ecology** will update language and flag in draft plan for further review; revisit as needed.
- **Port Gamble S'Klallam Tribe:** I would like to see a table of each watershed assessment units (WAU) with an estimate of the impact of permit exempt wells in each, expressed as a proportion of the summer baseflow estimated using Streamstats or Mastin, 2016. The table should be in the Subbasins chapter.
  - **Ecology:** Subbasins not based on WAUs. Committee does not yet have an impact of PE wells by subbasin (presented with consumptive use chapter).
  - **PGST:** WAUs are most granular scale. Could use heat map or parcel data to visualize the number of wells that go into each WAU. Express estimated offset quantity as a proportion of summer base flow using regression equations for ungauged streams (widely used in region). Would not be exact or verified but would provide a general idea of impact.
  - **Anchor QEA:** will look at the size of WAUs to determine how precise estimates of PE wells would go in. With groundwater, impacts could be felt further away / not in WAU. Lots of uncertainty and assumptions.
  - **Bob and Sam** will work together on this request; **Ecology** will include a comment in draft plan as a placeholder for this information.
- **Pierce County:** How about wells associated with group A water systems? Should the story tell the whole story re: group A, group B and permit exempt wells...and then clarify this planning only addresses consumptive use from new permit exempt wells.
  - **Pierce County:** would like to note in plan that there are more straws in the ground than just PE wells (e.g., various Group A/Bs, ag straws). Not necessary to quantify, just

- provide a brief background that acknowledges the committee mitigated for PE wells, but other wells may have an impact as well.
- **Squaxin:** this suggestion is consistent with the proposal Squaxin developed around additional well data.
- **Mason County:** agrees with Pierce County. Additional growth doesn't necessarily mean more Group A wells, just more connections.
- **Kitsap County** agrees with Pierce County that this additional context is appropriate here, recognizing that many people who will be signing off on this plan are not water systems experts so this context could be valuable, especially when projects/actions pertain to connecting to Group As.
- **City of Bainbridge Island** agrees with Kitsap County.
- **Ecology** will reach out to Department of Health and work with Bob M. to develop a generic paragraph that could be used here and in other WRIAs to provide brief explanation that permit exempt wells are a small piece of the water use puzzle.
- **Pierce County:** How is it coordinated? Perhaps reflects the comprehensive plans or incorporates assumptions that reflect comp plan goals and policies. Wouldn't it be appropriate to mention what brought this planning to be...meaning reference to the appeal of a rural element of a County's comp plan...and how it would support the growth? Could say a little more straight forward that the comp plans identify where and how future population, housing, and job growth is planned.
  - **Ecology:** Some of this content is being covered with additional sections being prepared for Chapter 1. Looking to counties to provide additional context that links this work to Comprehensive Plans.
  - **Kitsap County:** no objection; can help draft this content.
  - **Squaxin:** more coordination is good.
  - **Ecology** will include revised language in August plan draft; may reach out for support from counties.

## Adaptive Management

The committee discussed a proposed framework for draft adaptive management recommendations for inclusion in the WRIA 15 Plan. The framework includes the following key components:

- **Tracking/Monitoring:** What data should be gathered by what entities?
- **Reporting:** How should that data be reported (i.e. who prepares the report, how often, what do reports include)
- **Adaptations:** What actions are needed to respond to the reporting?
- **Funding:** How can the adaptive management components be funded?

### Reference Materials:

- [Discussion guide](#)

### Discussion:

- **Tracking + Monitoring**
  - *Need committee to provide information on **existing monitoring** in watershed.*
  - **Ongoing list and map of new/historical PE wells within each sub-basin.**
    - **Kitsap County:** historical PE well data will vary by jurisdiction / health district and difficult to obtain.
    - **Mason County:** stick to what legislation requires (new PE wells, not historical).



- **Port Gamble S’Klallam Tribe:** Erica Marbett (Squaxin Island Tribe) and Ecology are working on collecting historical well information.
- **Kitsap County:** challenging to quantify based on existing records; at best, could develop an estimate.
- **Suquamish Tribe:** review the number of parcels in rural areas that are not connected to a PUD or Group A/B system to estimate historical PE wells. Would not capture multiple wells on same property. How would this information be used going forward?
- **Pierce County:** concern around validity of an estimate based on multiple assumptions (what is margin of error?). Concern that others who read plan could make assumptions using these estimates.
- **King County:** agree with Kitsap County. Obtaining historical well data would be challenging and labor-intensive. King County could easily develop a range of total PE wells on Vashon Island.
- **Susan (facilitator):** more offline / subgroup conversations would be needed to include this information in adaptive management chapter; would need methodology to estimate historic wells; would need to be clear about purpose for including in plan.
- **Status of implementation for each project (not started, in progress, complete).**
  - **Suquamish Tribe:** concerned with relying solely on Salmon Recovery Portal for tracking implementation status for each project. Will offset projects (not habitat related) be tracked?
  - **Ecology:** intent of SRP is to track all projects, not just habitat. WDFW is currently piloting for streamflow with Nisqually. Committee would need to determine appropriate metrics for streamflows projects.
  - **WDFW:** Brittany Gordon can confirm internally.
  - **King County:** reporting on project status can be onerous without funding/support. Consider only reporting on those projects that have actually moved forward vs. all projects.
- **Streamflow/temperature monitoring, precipitation/drought conditions, climate indicators:**
  - **Pierce County:** what is purpose of gathering this data within the context of PE wells? How would it be used for planning?
  - **Port Gamble S’Klallam Tribe:** connected to enforcement/water master tracking instream flows to ensure if water levels are too low, we can curtail water use in basin.
  - **Kitsap County:** Lots of information would be nice to know and might have broader uses—but is the WRE plan the place to do that? Adaptive management for this plan should process information and monitor efforts through the project implementation lens (i.e., are projects having intended effects?). Tracking other information may be difficult.
  - **Squaxin Island Tribe:** agree with Kitsap County that detecting changes in streamflow is difficult but tracking the status/completion of project implementation is key to determining whether projects are producing expected amounts of water. Revised Squaxin Monitoring & Research proposal suggests strategies for an overarching program that would be developed after the WRE plan is implemented.
  - **King County:** determine which tracking/monitoring is required (short list) vs recommended. Lots of great suggestions in discussion guide but cannot require if entities do not have the resources to implement.

- **Susan (facilitator)** summarized that these ~~data points~~ Committee member suggestions will ~~stay on as a placeholder~~ be included for further discussion (potentially as “aspirational”).
- **Annual reports to Ecology.**
  - A description of the “status” of each project. “Status” refers to whether the project is in progress, not started, or complete.
  - **Kitsap County:** cannot commit counties to monitoring projects that fall within county if they are not the project lead.
  - **City of Bainbridge Island** agrees with Kitsap County.
  - **Susan (facilitator)** will change entity responsible to “implementers” instead of counties/cities.
  - **Pierce County:** assuming projects that receive streamflow grant funding from Ecology could provide regular status updates. Funding could also be provided to counties/cities/other entities as well.
  - **Ecology:** could report on projects that received streamflow grant funding; program does not have direction to report on projects funded by other sources. Salmon Recovery Portal could be used to track all projects, regardless of funding source. No one is currently on point to generate a report from the portal and incorporate it into the 5-Year Assessment.
  - **Pierce County:** what will happen to annual report after it is submitted to Ecology?
  - **Susan (facilitator):** report could be made available so that all those engaged in this work would receive an annual update. Primary focus would be on the 5-Year Self-Assessment (deeper assessment by counties/cities).
  - **Squaxin Island Tribe:** the law requires a plan with projects that offset water to compensate for PE well growth over the next 20 years but does not require implementation and monitoring. Down the road, if unable to show that the plan helped achieve intended results, open to another lawsuit. We may want an implementation committee to do this work. In WRIA 1, How do we what will Ecology account for what to do if the projects in the plan do not provide real water?
    - **Ecology:** Whatcom County through the WRIA 1 lead entity is doing reporting. wWhat ~~we do~~ happens next is unclear (do not have future commitments with funding/staff to take action).
    - **King County:** all entities are facing the same reporting budget uncertainties as Ecology. Ecology should ultimately be responsible for compliance and reporting.
- **Adaptation Strategies**
  - **Port Gamble S’Klallam Tribe** supports reconvening WRE committee annually with Ecology as the chair.
  - **Mason County:** supports assigning responsibility to group similar to Chehalis Basin Partnership (a group that has worked in this space for nearly 20 years with institutional knowledge of what’s going on in the basin). Would meet more than annually and require funding. Ecology would be a partner at the table; elected chair would work with consultants and Ecology (more community driven).
  - **Pierce County:** participates in four WRE committees and wants to be consistent in its approach across all. Would like to explore opportunities to leverage an existing group, but not familiar with which groups would be a good fit.
  - **Kitsap County:** if the default assumption is that counties will own adaptive management, how will that be organized -there are four different counties in this

**Commented [PP1]:** Confusing as written. This is what my notes had for what Susan said.

watershed alone? Existing groups that might be a good fit for leading this effort include LIOs / Lead Entities (i.e., Hood Canal Coordinating Council / West Sound Partners for Ecosystem Recovery) who already have systems for prioritizing projects and monitoring progress.

## Potential Policy Proposals

Ecology will distribute a survey to gauge support for policy and adaptive management proposals (open from 8/10-8/21). Survey feedback will help determine which proposals to include in the draft plan and which proposals to bring back to the committee for further discussion in September and the fall.

### Reference Materials:

- [Policy Proposal Tracker](#)
- <https://www.surveymonkey.com/r/WRIA15PolicyProposals>

## Recommendations from Project Workgroup

Stacy is discussing some of the projects with the Ecology's Water Resources program as there may be conflicts with the Foster decision (Gig Harbor Golf Course, Bainbridge Island Storage Projects). If these projects are deemed as not legally possible to implement now, the committee could still include in the plan for *future consideration* (assuming a future resolution to Foster). Ecology will share more with committee following the review. Even if these projects are pulled from the plan, there are other projects to help get to offset in each subbasin.

Ecology received initial comments on water rights acquisition opportunities and will continue to discuss during 8/10 project workgroup meeting. One example of how to present the water right information in the plan includes:

- Include short summaries of “**Tier 1**” water rights (12 or less). Conduct initial outreach with landowners and provide feedback to group. Confident enough to present in plan (and count towards offset). Burt will develop short summaries (amount of detail provided in plan will depend on amount of outreach).
- Group “**Tier 2**” water rights by scale smaller than subbasin and provide a generic description of opportunities in a basin, focusing on projects that are within a certain area of anticipated growth/impact. Burt to develop list, which would be archived with generic description provided in plan (not specific water rights). Likely not counting towards offset.
- Pursue any water rights in “**Tier 3**” headwaters or within a stream reach in WRIA 15 as there are likely few rights that become available. Burt to develop list, which would be archived with generic description provided in plan (not specific water rights).

### Reference Materials:

- [Discussion guide](#)
- [Water Rights Opportunities + Comments](#)
- [Project Inventory](#)

### Discussion:

- *Does the committee want to recommend additional offset or habitat projects for detailed development for inclusion in the watershed plan?*

- **Port Gamble S’Klallam Tribe:** Squaxin’s [Forest Stand Age + Flow Restoration Project](#) may need further development. Could be more feasible in South Kitsap Peninsula on Hood Canal side (still some forest landowners but may be all DNR).
  - **Suquamish Tribe** likes concept. It came from Nisqually who had control over forest land. Need more information on how it could work with small forest owners. Would not want extended stand rotation to be mandatory; development pressures are already heavy and don’t want to see forest lands sold to build houses.
  - **Squaxin Island Tribe:** project is currently a categorical / programmatic placeholder but there may be opportunities in the future to link to other projects. It would require a different model from Nisqually; opportunity for GPC or others to acquire land and take it out of timber production into conservation status. Quantify streamflow benefits of managing long standing / old growth vs previous timber harvest.
  - **Kitsap County:** county is already moving towards documenting stand age, structure, height, and condition under Natural Resources Assess Management Program.
  - **Ecology** will flag this project for further discussion during 8/10 project workgroup meeting.
- *Does the committee want to stop development of any projects that don’t look promising?*
  - Big Beef DNR Parcel Storage Project – recommendation to stop development due to stream closure and permitting challenges.
  - Gold Mountain Golf Course Water Right and project – concern from City of Bremerton, conservation efforts underway.
- *Recognizing we have limited budget for developing projects in detail, does the committee want to have any habitat projects developed in detail?*
  - **Ecology:** tech consultants did not dig deep into any projects unless there was a request from committee. Other WRE committees have chosen to develop habitat projects in detail (similar to detailed project descriptions for offsets). Anchor QEA has salmon expertise they could utilize to develop those projects with their sponsors in more detail. Note this would shift resources away from developing offset projects (limited budget to spend on project work).
  - **Squaxin Island Tribe:** ~~keep habitat~~ [Quantification of Anderson Island](#) projects [can be](#) on back burner. Try to focus effort by subbasin. Could combine South Sound Islands with rest of South Sound if needed (few salmon streams/projects on islands).
  - **WDFW:** would like to see the upper Big Beef project offsets quantified. Likely a wetland storage type project, which may be quantifiable. Similar comment for the Burley Creek ditched wetland restoration project.
- *Does the committee have recommendations on presentation of the project inventory in the watershed plan?*
  - Options proposed by project workgroup:
    - Present projects by subbasin.
      - **Squaxin Island Tribe:** suggest including tables for each subbasin.
      - **Ecology** will organize recommendations by subbasin in next draft plan.
    - Present projects by project type (e.g. “projects contributing towards offsets” and “projects contributing towards habitat improvements”).

- Describe the likelihood of implementation, sponsorship, funding status, and stage of project development.
    - Present projects in a way that is easy for decision-makers to understand and provide feedback.
    - Retain all projects in the project inventory to include in an appendix.
  - Table 1 = sample for projects contributing towards consumptive offset.
    - **Suquamish Tribe:** concerned with “Additional Benefits” column header. When elected officials review plan, “benefits” have many different connotations. Consider including the county’s Land Use Table with checkboxes for general categories. Elected officials won’t review technical detail (especially in these tables). Should ensure tables summarize the projects as clearly as possible (even if we have to sacrifice some detail).
      - **Ecology:** additional benefits could include number of riparian mile or acres planted, etc. Flag specific categories we should include in next draft plan. Determine what will be measured to assess the outcome of a specific project. Qualitatively describe what we expect to see if no metric.
- *Does the committee want to make a formal commitment to find enough offset projects by subbasin to meet the anticipated consumptive use estimate for that subbasin?*
  - **Port Gamble S’Klallam Tribe** makes sense to have formal commitment to find enough offset projects by subbasin, given the committee has supported this from the beginning.
    - **Ecology:** language in subbasin memo states the committee will ensure there is justification if offsets are not met by subbasin (with limited exceptions).
  - **Great Peninsula Conservancy:** concerned there will be issues if committee falls short of offsets in one basin after making a formal commitment. Can the committee instead agree (informally) that our goal is to offset by subbasin?
    - **Mason and Pierce County and City of Bainbridge Island** agree.
    - **Squaxin Island Tribe** disagrees and believes it is important to formalize commitment to emphasize the importance of having projects in each subbasin. Cannot approve plan if there are no projects in South Sound that help streams in the Squaxin’s U&A (could be a red flag issue). Whether or not committee votes—it’s critical to find projects in every subbasin.
    - **Skokomish Tribe:** concerned there are no projects in Hood Canal subbasin.
    - **Ecology** will share updated project inventory with committee (which includes a handful of projects in North and South Hood Canal). Critical that committee raises any gaps or concerns ASAP when reviewing inventory.
  - **Susan (Facilitator)** noted it is important to hear from entities that feel they cannot approve a plan unless offset is met by subbasin (nothing prevents them from not approving the plan if it doesn’t meet offset by subbasin). She recommended the committee redirect its time towards identifying projects in subbasins where there are gaps instead of using the time to formalize commitment language.
    - **King County:** agrees with this approach. The requirement is necessary but without seeing a close to final list of projects by subbasin, unsure whether that is feasible.
    - **Susan (Facilitator)** suggested the project workgroup and/or committee goes over the project inventory by subbasin. The committee can provide input on which subbasins they are concerned about and identify any gaps/issues.
  - **Stacy (Ecology), Susan (Facilitator), and Paul (Squaxin Island Tribe)** no longer think a formal vote is necessary, but there is an understanding that this committee is aiming to

meet offsets by subbasin. Bring forward any gaps so resources can be dedicated towards finding projects in those subbasins.

## **Public Comment**

No public comment.

## **Action Items for Committee Members**

- Review [Chapter 4](#) and provide comments by 8/20.
- Complete [survey](#) by 8/21.
- Review draft compiled WRE Plan (anticipated distribution on 8/28).

## **Action Items for Ecology and Consultants**

- Schedule a sub-group meeting to further discuss adaptive management components in advance of the September committee meeting.
- Stacy will work with Bob + HDR to update project ledger with offset need by subbasin and share with committee at September meeting.

***Next committee meeting: Thursday, September 3, 2020 – 9:30AM – 2:30PM***

# Discussion Guide: Proposed Revisions to WRIA 15 Watershed Restoration and Enhancement Plan

## Chapters 1 and 4

WRIA 15 Committee Meeting September 3, 2020

### Purpose of Discussion

Ecology is preparing draft sections of the WRIA 15 watershed restoration and enhancement plan (watershed plan) for committee review. Because the law requires that all members of the committee approve the plan, Ecology requests that committees collectively determine how to address proposed revisions. Today's discussion will focus on select comments that Ecology has highlighted for committee discussion. Other comments are undergoing review by Ecology management or were circulated to the committee for review.

### Background

The streamflow restoration law states, "By June 30, 2021, the department shall prepare and adopt a watershed restoration and enhancement plan for each watershed listed under subsection (2)(a) of this section, in collaboration with the watershed restoration and enhancement committee. Except as described in (h) of this subsection, all members of a watershed restoration and enhancement committee must approve the plan prior to adoption" (RCW 90.94.030(3)). Ecology is preparing draft sections of the plan based on templates used across all eight water restoration and enhancement committees and incorporating content from the WRIA 15 technical memos. Ecology prepared draft Chapters 1, 2 and 3 and distributed to the WRIA 15 committee in July for review. Ecology prepared draft Chapter 4 and distributed to the committee in August for review. Several committee members provided comments. Ecology distributed all comments to the committee for review and to identify any concerns with the proposed revisions. Select comments propose the addition of information or a change in the original content and are identified here for discussion. Ecology is committed to sharing all comments received on the draft plan with the committee prior to making the revision.

### Considerations for the Committee

As all committee members must approve the plan, the committee must be comfortable with any revisions proposed by entities. The committee will have another opportunity to review the draft content of the plan later in the fall. All current plan content for the WRIA 15 plan, including draft chapters and compiled comments from committee members, is available on Box: <https://ecy.box.com/v/WRIA15WREPlan>. Stacy reviewed the comments on the initial draft of Chapter 4 and incorporated those correcting information to incorporate into the draft compiled plan. Below we present the outstanding questions for committee discussion and decision on revisions.

## Questions for the Committee

Does the committee have concern with any of the following revisions or additions proposed for Chapters 1 and 4?

Proposed revision	Associated content	Entity	Considerations
Recommendations for additional content on water system plans, permit exempt wells in the context of other water use, and water quality.	Chapter 1	Multiple	Stacy and Bob provided some draft revisions to Chapters 1-3. A track changes version of the document is available on Box along with the clean version in the compiled plan.
All projections have uncertainty because they incorporate assumptions...could it be written because of the nature of the assumptions...or to recognize the effect of the assumptions???	Under summary of uncertainties and assumptions for growth projections. Line 62	Pierce Co	Okay to make revisions unless concerns from committee.
Concur with Squaxin Tribe that a high growth scenario should be considered for Mason Co. The County's justification was that they have not seen that level of growth in WRIA 15 historically and that soil conditions and critical areas will limit development. However, using historic trends in Mason Co seem unreliable. Kitsap County home prices have increased, and developable lands inventory is growing slim. Mason County (Belfair Area) is a likely next area for development, and development on constrained parcels can still be allowed through variances and reasonable use exemptions	Referring to comment 2 regarding the consideration for Mason Co high growth scenarios. Line 72	WDFW	This is up for the counties to determine if they are comfortable including higher growth scenarios. For committee discussion.
A section discussing the uncertainties and limitations of these assumptions would be useful (like you have for the consumptive use section). For example, zoning is subject to change (and does frequently). A more conservative approach would be to include commercial and industrial zoned parcels in unincorporated areas, as these are sometimes downgraded to residential zoning.	Under distribution of new wells. Line 81	WDFW	Okay to make revision unless concerns from committee. May need to work with counties to identify the assumptions and uncertainties.
We need to acknowledge the uncertainty in the assumption that 90% of indoor use returns to the 'immediate water environment' via septic drainfield. While the water may enter the drainfield and soak into the ground, it is likely that water would travel laterally once it encounters a low permeability layer. There is little evidence that 90% of the water is subsequently contributing to streamflow or is recharging aquifers which supply wells.	Referring to uncertainties and assumptions for CU. Line 204.	PGST	Needs committee discussion.



add "metered water use is paid for by the gallon, often with increasing rates for higher water use tiers. The cost factor of water use is implicit to the USGS groundwater model method. Permit exempt wells are unmetered, and therefore it is reasonable to assume those would use more than a metered user where cost is a factor."	Overview of the USGS Groundwater Model. Line 210	PGST	Needs committee discussion. Don't believe that there is reference to support. Ecology has made information available from the metering pilots and does not show significant difference.
Additional elements of the outdoor irrigated method that may reasonably influence the final estimated average irrigate acreage should be discussed in this section. Currently, this section only describes two aspects of the methodology that contribute to the general uncertainty of outdoor irrigated acreage estimates: (1) a small sample size, and (2) assumptions of irrigation rates and efficiencies. While this does not need to be an exhaustive list, the overarching assumptions and uncertainties of the technical approach should be described. Other points of uncertainty within the method may include: counting parcels with no visible irrigation as a zero value, suitability of the method in heavily treed areas or parcels without irrigated lawns, and a lack of field validation to confirm the accuracy of estimates.	Overview of the Irrigated Areas Method. Line 214	WDFW	Needs committee discussion on consideration for these additional uncertainties.
In reality, households apply water to their lawns and gardens in many different ways. Some outdoor irrigation methods may be more efficient than a 25 percent water loss and some may be less efficient. For example rotary spray heads are more efficient than misting heads, but less efficient than drip systems.	Discuss uncertainties around consumptive use estimates for outdoor irrigation. Line 234	PGST	Needs committee discussion on whether okay to include.
Our Director has asked on several occasions for a breakdown of per-connection use in gallons per day (GPD). Is it possible to incorporate a figure in this chapter that summarizes the per-connection use in gallons per day, broken out by indoor, outdoor, and total use for both the proposed CU methods? It would be helpful context for our decision makers.	Under summary of consumptive use estimates. Line 236	Pierce Co	Okay to include unless committee has concern.
Lines 5-7 misinterpret the plain language of RCW 90.94.030(3)(e) by restricting estimates to new domestic permit-exempt wells. The statute's plain language requires estimates of all new cumulative consumptive water use impacts over 20 years, "including" permit-	Introduction to projections for new wells.	Squaxin Island Tribe	This comment contradicts the Streamflow Policy Interpretation POL 2094 and Final NEB Guidance.

exempt withdrawals. This underestimate calls into question the entirety of Chapter 4 and undermines the statutory mandate to restore and enhance streamflows.			
Some explanation should be provided for what "low, medium, and high" represent. I'd suggest: "low estimates are based on assuming that estimates may be overestimates of future growth. Medium estimates are the Committee's most likely scenario. High estimates are intended to represent future conditions producing higher growth than the assumptions for medium growth."	This section is providing the estimate for new permit exempt well growth scenarios.	Squaxin Island Tribe	Okay to include if committee is comfortable with defining low, medium and high in this way.
Please add the following sentence: "Several committee members have requested that the GMA high growth projections be considered in the analysis. The Counties have been unwilling to include that information. This concern has been partially addressed by Pierce and King Counties' methodology, but has not been addressed in Kitsap or Mason Counties' analysis. Committee members agreed to revisit this issue as part of consideration of a 'safety factor'"	Referring to comment 2 regarding the consideration for Mason Co high growth scenarios. Line 72	Squaxin Island Tribe	Needs committee discussion. This is referring to a comment in the draft plan that should be resolved before the plan text is finalized. It is not intended that this comment will remain in the plan.
"These parcels are outside of urban growth areas..." Was this assumption made in every county? Information has been provided that PE wells can be installed inside UGAs. This point should be discussed in more detail.	<b>This section is discussing distribution of new PE wells. Lines 79-80</b>	Squaxin Island Tribe	Stacy to talk with HDR
To be more accurate: "... that households use (such as for kitchens, bathrooms, and laundry), and that leaves the house as wastewater, typically to a septic system."	This section is discussing what constitutes indoor water use.	Squaxin Island Tribe	This comment is referring to typical definition of household use. Recommend do not make edit to include the septic system language. Minor revision made.
Add another subsection to section about climate change, and the likelihood that demand for outdoor water use (under any estimation method) will likely increase over the next 20 years due to increasing summer temperatures and evapotranspiration.	This section is discussing uncertainties and assumptions of consumptive use.	Squaxin Island Tribe	Okay to include unless concerns from committee.
Add a sentence about the calculation using a substitution of 0.05 acres for zero - a 95th percentile value from this analysis was 0.12 acres irrigated.	This section is discussing the irrigated area method for calculating consumptive use.	Squaxin Island Tribe	Okay to include unless committee has concerns.

The sentence about the GeoEngineers quality check is misleading. The statement suggests that the study confirmed the calculations, when it did not. The comparability study showed that the HDR method was far lower than the GeoEngineers analysis. The memo in the appendix shows that the acreage could be increased by 0.02 to 0.05 acres average per parcel - a range similar to the difference between the 0.08 chosen for the calculation and the 0.12 found with substitution for zero and 95th percentile.	This section is discussing the irrigated area method for calculating consumptive use.	Squaxin Island Tribe	Discuss with HDR.
Other factors of uncertainty that should be included: water demand varies from north to south on the Kitsap peninsula, so the estimates may be low for drier areas; the analysis is based an annual average but impacts may be seasonal.	This section is discussing assumptions and uncertainties associated with irrigated areas analysis.	Squaxin Island Tribe	Okay to include unless concerns from committee.
This chapter seems incomplete. A section is addresses a safety factor and the final consumptive use estimate required by law which will be the target for offsets. A placeholder should be included for the final decisions on these points.	Chapter 4 – consumptive use	Squaxin Island Tribe	The committee has not made a decision on consumptive use and comments and placeholders are already included in the draft chapter. Additional text will be added once committee reaches agreement on consumptive use estimate and safety factors.

# WRIA 15 Policy and AM Survey Results

POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
A04 - Upgrade Well Reporting (Squaxin Island Tribe)	0	1 <i>ECY: No concerns, just to note that recommendations for work for Ecology to undertake will be considered at Ecology's discretion. Ecology will consider recommendations from the committee as part of the annual/strategic planning process.</i>	11 <i>KPUD - Please note the mandating of a lat/long entry may improve the accuracy in most cases, it does not automatically make the location accurate. I have seen many examples of errors in the lat/long entry. However, having the lat/long coupled with aerial photo mapping tool should improve the accuracy as best one can.</i>	12
A05 - Implementation Lead (Squaxin Island Tribe)	0	5 <b>Squaxin:</b> This is a "straw draft". Revisions should be expected as part of discussions of adaptive management. <b>Bremerton</b> supports opening up implementation coordination to a broader stakeholder group such as WSPER. If the current WRIA 15 committee becomes the implementation committee, Bremerton supports Ecology as the facilitator and would be ok with a commitment to reconvene annually. It should be made clear that participation in the proposed future implementation committee by current committee members is optional. The inclusion of this proposal in the plan is not a commitment of current members to participate in a future, non-mandated committee.	7	12

POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
		<p><b>Kitsap County:</b> Generally support provided Ecology leads. Need to define details, frequency of meetings, etc.</p> <p><b>Mason County:</b> This needs a little more thought but the concept is important to ongoing adaptive management. I would want Ecology to be at the table but not in charge.</p> <p><b>Skokomish Tribe:</b> independent partnership organization not under an agency umbrella, but with full participation of all stakeholders (WREC), Kitsap County Conservation District could host this organization and possibly provide in kind infrastructure/capacity (office space, etc). Vision might be that the Kitsap Conservation District (KCD) could not only host this organization but also bring a Water Steward on board as staff or under contract. Support monitoring could be done by one or two contracted techs and/or by partnership organizations who have monitoring capacity, including tribes. Also volunteers as citizen scientists? Support with increased fees from PEW (\$ 1,000-\$ 2,000).</p>		
A11 - Durability of Implementation (Squaxin Island Tribe)	0	7	5	12

POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
		<p>could be included directly into the plan itself? I like the idea, I'm not sure of its effectiveness as a standalone entity. To be more effective wouldn't it be ideal to tie it to our legally required plan? Just my thoughts...</p> <p><b>Ecology</b> can not make commitments in the plan or obligate the Director to any decisions regarding plan adoption or rulemaking. Important to consider the rulemaking process in making any recommendations.</p> <p><b>King County:</b> Likely would not support due to increased workload on county staff.</p> <p><b>Kitsap County:</b> No categorical disagreement with referencing this in other plans, as statements of intent by WREC members. Why would this be limited to counties and Ecology? Why wouldn't this interlock with the plans of all WREC members? Caveat that a Comp Plan provision goes through a public process and a proposal may not be adopted as originally proposed - there are no legislative guarantees.</p> <p><b>KPUD:</b> I think this is somewhat redundant to the previous proposal of a lead entity for the plan/committee.</p> <p><b>Mason County:</b> This needs more thought. Does it fall under a basin partnership? I'm not sure how we can, through policy, legislate commitment. The tribe has concerns about the county following through which are the same concerns that the County has with the tribe.</p>		
	1	7	3	11

POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
A14 - South Sound Water Steward (Squaxin Island Tribe)	<p><b>Mason County:</b> Resistant; •Policies that encumber county resources; •Policies that place higher costs to homeowners; •Policies that reduce implementation of low income housing; •Policies/projects without timelines for implementation; •Research funded solely by the county; Opposed; • Policies outside of adaptive management; •Water rights removals from municipalities and Group A systems; •Policies without sunset clauses; •Policies that abdicate local control to state agencies; •Polices that transfer local funds to state agencies; • Policies that would add additional elements to the comprehensive plan; •Projects with low feasibility; •Policies inconsistent between WRIA’s 14 and 15; •Additional regulation without quantifiable positive impact; • Policies that increase housing shortages</p>	<p><b>City of Bremerton:</b> We support a position at Ecology such as Water Steward dedicated to providing technical assistance, education, and data gathering and a separate position at Ecology for enforcement.</p> <p><b>Squaxin:</b> This proposal was combined with a King County proposal. A revised version was sent on August 7th. This proposal was already combined with the King County proposal, which was sent on August 7. The revised version was not included in the survey.</p> <p><b>City of Gig Harbor:</b> Where is funding going to come from? City will likely not be willing to contribute funds/tax dollars.</p> <p><b>ECY:</b> No red flags, just similar note as on earlier proposals around Ecology's consideration for any proposals that impact staff workload.</p> <p><b>Kitsap County:</b> Appears to apply to South Sound only. Apparently does not apply to WRIA 15. Would need to define scope of duties more clearly. Support education role. Would need to develop mechanisms for dispute resolution.</p> <p><b>KPUD:</b> This proposal is sound and I am in general agreement with it. I do have minor qualms about the wording of the first paragraph, such as "water is actually scarce". I disagree. As long as it rains like it has in the previous several decades (not a given), water is abundant. Poor management of the water resource could lead to scarcity for stream resources. This proposal is about the management of the water resource to prevent a scarcity.</p>		

POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
		<p><b>Skokomish:</b> This position should be either under the WA ECY or possibly more appropriately within the Klitsap Conservation District. Funding would need to be addressed however ECY could possibly supply some support for this in addition to the an increase in PEW fees (\$ !500-\$ 2,000) where a portion is dedicated to supporting this postion and the implementing organization. Also concerns about capacity with only one water steward however support monitoring could be done by one or two contracted techs and/or by partnership organizations who have monitoring capacity, including tribes. Also volunteers as citizen scientists?</p>		
<p><b>A20 - Monitoring &amp; Research (Squaxin Island Tribe)</b></p>	<p>0</p>	<p>6</p> <p><b>City of Bremerton:</b> A comprehensive monitoring and research program is a huge undertaking with substantial cost. It would be useful to identify current monitoring programs and start with a pilot study of a localized sub-area to study the effectiveness of specific projects.</p> <p><b>King County:</b> Likely would not support due to increased workload on county staff.</p> <p><b>Kitsap County:</b> No objection to improving data in general. Seems nice to do but not necessary. Would require funding for implementers that would divert funding from work that would produce offsets. Unclear how this will mitigate offsets since it does not affect forecasted withdrawals or growth rates.</p>	<p>5</p> <p><b>WDFW:</b> Please include WDFW in planning for this proposal.</p>	<p>11</p>



POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
		<p><b>KPUD:</b> The concept of this proposal is a good one; however, the implementation of one element will be difficult: "Flow monitoring at all sites with ISF levels." This is a valid goal, but not all streams with ISF levels CAN be monitored. The difficulty in finding access to a proper site that is without tidal influences, beaver pond influences, conducive stream channel morphology, etc. is often insurmountable in many of the small streams in WRIA 15.</p> <p><b>Mason County:</b> Resistant • Policies that encumber county resources • Policies that place higher costs to homeowners • Policies that reduce implementation of low income housing • Policies/projects without timelines for implementation • Research funded solely by the county</p> <p><b>Skokomish Tribe:</b> This could be rolled over into an implementing organization. Support monitoring could be done by one or two contracted techs and/or by partnership organizations who have monitoring capacity, including tribes. Also volunteers as citizen scientists?</p>		
<b>A23 - Water Supply Data for Comprehensive</b>	<p><b>City of Bremerton:</b> This proposal is beyond the requirements of the law.</p> <p>3</p>	<p><b>King County:</b> The idea is good but being able to include this volume of additional plan is unlikely at this time</p> <p>5</p>	<p>3</p>	<p>11</p>

POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
<b>Water Planning (Squaxin)</b>	<p><b>Ecology</b> has serious concerns with this proposal. This proposal, as currently framed, extends beyond the requirements of the statute and is not required for compliance with the law. Even a subset of this data would be very challenging to compile and would not present complete information. We are also concerned that it covers entities that are not included as part of this planing process (DOH, water purveyors, etc). We can not complete this work prior to plan completion and any recommendations for post plan work should be considered as part of adaptive management.</p> <p><b>KPUD:</b> The WRIA 15 plan is to offset consumptive impacts of new PE wells drilled in the next 20 years. This proposal over-reaches the plan's purpose by including new water rights and inchoate rights. Also, the data will come from water users and water purveyors. They should be included in the list of "key players" as they must be involved with the development of a plan to obtain their data. Water purveyors and water users must be included in the list of key players.</p>	<p><b>Skokomish:</b> What is the "cumulative" consumptive use of ALL users within WRIA 15? This would be comprehensive in nature but would tell the "real" story, not just a part of it. 90.94.030 (3)(b) At a minimum, the plan must include those actions that the committee determines to be necessary to offset potential impacts to instream flows associated with permit-exempt domestic water use. HOWEVER (e) The watershed restoration and enhancement plan must include estimates of the cumulative consumptive water use impacts over the subsequent twenty years, including withdrawals exempt from permitting under RCW 90.44.050. As the Skokomish Tribe is one of the historical senior water right holders, this is an important component and should be briefly addressed in the plan as a component that the tribes support for further consideration and funding for a "WRIA 15 Comprehensive Consumptive Water Use Estimate" study.</p> <p><b>Kitsap County:</b> No objection to improving data in general. Seems nice to do but not necessary. Would require funding for implementers that would divert funding from work that would produce offsets. Unclear how this will mitigate offsets since it does not affect forecasted withdrawals or growth rates.</p> <p><b>Mason County:</b> The County position is that this is not required by law. The law pertains to new permit exempt wells. Resistant • Policies that encumber county resources • Policies that place higher costs to homeowners • Policies that reduce implementation of low income housing •</p>		

POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
		<p>Policies/projects without timelines for implementation • Research funded solely by the county • Policies not required by law</p> <p><b>City of Gig Harbor:</b> Some hesitation because Ecology's position that this is not required by law, why are we going to spend time on this if not needed?</p>		
<b>A25 - Salmon Recovery Portal (WDFW)</b>	0	<p>3</p> <p><b>KPUD:</b> Will this cover ALL projects? I believe there will be a need for another mechanism to track non-habitat projects.</p> <p><b>Mason County:</b> Though not entirely opposed, this needs more thought. Who pays? Who collects data and how is that vetted before going forward. There's been no discussion of an alternative. What would an alternative look like?</p> <p><b>PGST:</b> Should include project effectiveness.</p>	<p>8</p> <p><b>Kitsap County:</b> Would have to track projects anyway. Linking it to existing efforts reduces burden. Coordinates effort with salmon recovery projects.</p>	11
<b>A26 - County Planning Study - Streamflow Restoration Effectiveness (Squaxin)</b>	<p>2</p> <p><b>City of Bremerton:</b> This proposal is beyond the intent of the plan.</p> <p><b>Mason County:</b> This places an undue burden on the County, crosses jurisdictional and policy boundaries, is unfunded, and seems to set the stage for litigation. Opposed • Policies outside of adaptive management • Water rights removals from municipalities and Group A systems • Policies without sunset clauses • Policies that abdicate local control to state agencies • Policies that transfer local funds to state agencies • Policies that would add additional elements to the comprehensive plan • Projects with low feasibility •</p>	<p>4</p> <p><b>City of Gig Harbor:</b> Not enough information to form an opinion</p> <p><b>Kitsap County:</b> No objection to improving data in general but unclear why this is needed. Seems nice to do but not necessary. Would require funding for implementers that would divert funding from work that would produce offsets. Unclear how this will mitigate offsets since it does not affect forecasted withdrawals or growth rates.</p> <p><b>KPUD:</b> Although this proposal seems like a good idea to learn what is working, it seems outside the scope of the plan and legislation.</p>	<p>5</p>	11

POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
	Policies inconsistent between WRIA's 14 and 15 • Additional regulation without quantifiable positive impact • Policies that increase housing shortages • Policies not required by law • Policies that set the stage for litigation	<b>Skokomish:</b> Should be done by a partnership between Counties and the Implementing Organization.		
<b>P07 - Plan Implementation Funding (Squaxin Island Tribe)</b>	<p><b>City of Bremerton:</b> We recognize that a sustainable, stable funding source is critical. We suggest that the funding source be broader and more equitable than a fee placed only on new permit exempt wells.</p> <p><b>KPUD:</b> I do not disagree with the concept that we may need funding in the future to implement the plan. However, this proposal seems premature and somewhat bold to ask to triple the fee even before a plan is approved.</p> <p><b>Mason County:</b> Opposed • Policies outside of adaptive management • Water rights removals from municipalities and Group A systems • Policies without sunset clauses • Policies that abdicate local control to state agencies • Policies that transfer local funds to state agencies • Policies that would add additional elements to the comprehensive plan • Projects with low feasibility • Policies inconsistent between WRIA's 14 and 15 • Additional regulation without quantifiable positive impact • Policies that increase housing shortages • Policies not required by law • Policies that set the stage for litigation</p>	<p><b>Squaxin:</b> This is a "straw draft". Revisions should be expected as part of discussions of adaptive management. Just a "straw draft" - subject to discussion as part of Adaptive Management, at the end of the process.</p> <p><b>King County:</b> Support the idea of additional fees, but I don't think we have enough budget information or demand to justify the budget. Perhaps this is modified to say in X years we review the budget.</p> <p><b>Ecology:</b> Note that rulemaking is a public process and comments from all entities and all locations from across the state are considered equally. The decision to embark on rulemaking is at the discretion of the Director and there is no guarantee of the outcome. Note also that this proposal is flagged for potential legislative change because of the proposal on how to allocate funding from the fees. Stacy can investigate further if this proposal moves forward.</p> <p><b>Kitsap:</b> Would need a more robust fiscal analysis. At this point it seems arbitrary. We don't have an estimate of plan implementation cost yet so we don't know how much revenue is needed above and beyond the existing \$300 MM revenue. It's very difficult to support an increase if we</p>		
	3	5	3	11

POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
		<p>can't clearly and specifically state what we are getting for the increase.</p> <p><b>PGST:</b> The funds should be earmarked to go back to the WRIA / County where they were paid.</p>		
<b>P16 - Drought Response Limit (Squaxin Island Tribe)</b>	<p><b>Mason County:</b> Already in law. Violates WAC 246-272A-0230. Does not provide for local conditions that may be different from the state wide conditions. Opposed • Policies outside of adaptive management • Water rights removals from municipalities and Group A systems • Policies without sunset clauses • Policies that abdicate local control to state agencies • Policies that transfer local funds to state agencies • Policies that would add additional elements to the comprehensive plan • Projects with low feasibility • Policies inconsistent between WRIA's 14 and 15 • Additional regulation without quantifiable positive impact • Policies that increase housing shortages • Policies not required by law • Policies that set the stage for litigation</p>	<p><b>Squaxin:</b> This is not the latest version of the proposal - a newer version was provided on August 7th.</p> <p><b>Kitsap County:</b> Withdrawal reduction during drought seems reasonable. Establishing limits seems more like Ecology's area. Unclear what County role would be - cannot commit to support without that clarity.</p> <p><b>KPUD:</b> The reduction in allowed water use is already in place for new PE wells, the scope of our plan. I think this proposal is somewhat redundant and could be (or partially is) included in previous proposals. I agree with the concept of education first. It is effective. We see that in times of drought when reservoirs are down in Seattle and they ask the public to reduce usage, usage in Kitsap County declines at the same time because of the education outreach in the media targeting Seattle customers.</p> <p><b>PGST:</b> Expand this proposal to cover all domestic water users including public water system connections. Include a moderate drought limit of 350 gpd and a severe drought limit of 150 gpd. Provide</p>	<p><b>Skokomish Tribe:</b> This is about climate change adaption and resiliency, and should be integral to adaptive management.</p>	<p>11</p>

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		<p>exemption where additional water can be purchased from a "bank" that is subject to an absolute limit.</p> <p><b>City of Bremerton:</b> How would these limits be tracked &amp; enforced without metering PE wells? We suggest a drought response focused on education and recommendations to the public.</p> <p><b>Ecology:</b> Note that rulemaking is a public process and comments from all entities and all locations from across the state are considered equally. The decision to embark on rulemaking is at the discretion of the Director and there is no guarantee of the outcome.</p>		
<b>P21 - Adaptive Management Responses (Squaxin Island Tribe)</b>	<p>2</p> <p><b>Ecology</b> has concerns with this proposal. As currently prepared, it reads as though it commits counties to work beyond the scope of the planning process and RCW 90.94. It also reads that it is covering all PEWs and not just those for domestic purpose. Regarding implementation, Ecology cannot compel or obligate entities to move forward with specific projects (as stated in POL 2094). Any kind of commitment to close basins or enforce other restrictions, is in conflict with RCW 90.94 and would require rulemaking (which is at the discretion of the Director).</p>	<p>4</p> <p><b>Squaxin:</b> This proposal is a "straw draft". Further discussion and refinement is expected as part of discussions about Adaptive Management.</p> <p><b>Mason County</b> is generally supportive but more details need to be worked out. The Chehalis Basin Partnership model is a good one to follow. This policy seems in conflict with other policies as proposed by the Squaxin Tribe (ex. water steward) Supportive Mason County is generally supportive. • Research when funded by partnerships or outside (non-general fund) sources • Managed Aquifer Recharge • Habitat improvement projects • Off channel storage projects in drainage headwaters • Policies with adaptive management or sunset clauses • Public conservation outreach especially if Tribal</p>	<p>5</p> <p><b>Skokomish:</b> This would go hand in hand with establishing an Implementing Organization. Tracking permit exempt well construction and offset projects should be the responsibility of the state and project funding grantors rather than counties and cities. Wouldn't well construction tracking be covered by the upgraded well reporting system?</p>	<p>11</p>

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	<p><b>Kitsap County:</b> No categorical objection to adaptive management, but this proposal is impractical. It assumes the counties will be the implementers. This WRIA has 4 counties. Unclear how the "county" role would be implemented among 4 jurisdictions. There is no single point of responsibility. The proposal places counties in an implementation role outside their jurisdictions. If, in the role of enforcing rules, Ecology determines a key action did not happen in one location, are all four counties then in default? It places local jurisdictions in a role traditionally and currently held across jurisdictions by Ecology. Kitsap County does not have resources for this so full funding through Ecology would be necessary.</p>	<p>sponsored • Reuse of purple water for irrigation • Purple water for aquifer recharge • Policies that are consistent across WRIA 14, 15</p> <p><b>City of Bremerton:</b> Tracking permit exempt well construction and offset projects should be the responsibility of the state and project funding grantors rather than counties and cities. Wouldn't well construction tracking be covered by the upgraded well reporting system?</p> <p><b>King County:</b> We support with Ecology, not the counties, implementing.</p>		
<b>P28 - Hookup Incentives (Squaxin Island Tribe)</b>	<p><b>City of Bremerton:</b> A problem with a loan fund is that the loan and interest will be paid by all ratepayers. It may be more feasible for some Group A systems to make it a requirement for adjacent parcels to hook up.</p> <p><b>Kitsap County:</b> Unclear what the point of this is. Why would someone building a house, who already has a loan, want</p>	<p><b>Squaxin:</b> An updated version was sent out on August 14th.</p> <p><b>PGST:</b> Some language to show this policy does not expand urban or suburban growth by expanding water system coverage.</p>		
	3	4	4	11

POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
	<p>another loan just for the water connection? No desire to do revolving loans by Kitsap County.</p> <p><b>Mason County:</b> Having run programs like this before, they are not successful. We still have not seen the scope of need from the Squaxin Tribe. How big is the problem this is trying to fix? Opposed • Policies outside of adaptive management • Water rights removals from municipalities and Group A systems • Policies without sunset clauses • Policies that abdicate local control to state agencies • Policies that transfer local funds to state agencies • Policies that would add additional elements to the comprehensive plan • Projects with low feasibility • Policies inconsistent between WRIA's 14 and 15 • Additional regulation without quantifiable positive impact • Policies that increase housing shortages • Policies not required by law • Policies that set the stage for litigation</p>	<p><b>Skokomish Tribe:</b> Instead of having to actively manage a fund, recommend a water cost rate reduction or tax incentive.</p> <p><b>King County:</b> Do not support due to minimal cost/ benefit and development should pay for development.</p>		
<b>P44 - Permit Exempt Well Withdrawal Limits (Squaxin Island Tribe)</b>	<p>2</p> <p><b>Kitsap County:</b> Need rationale for 500 gpd indoor SFR use threshold. Why not leave it where it currently is under 6091 legislation? 3000 gpd threshold would limit group connections to 6 - why? Outdoor area limit seems arbitrary - appears to be based on 80-parcel survey in consumptive use estimate? If so, that's not a strong basis. How would this be enforced?</p>	<p>5</p> <p><b>Squaxin:</b> A revised version was sent on August 7th.</p> <p><b>Ecology:</b> Note that rulemaking is a public process and comments from all entities and all locations from across the state are considered equally. The decision to embark on rulemaking is at the discretion of the Director and there is no guarantee of the outcome.</p> <p><b>City of Bremerton:</b> We have concerns about how to enforce this proposed regulation. We support basin-specific, scientific study and calculated reductions to set particular limits on water use.</p>	<p>4</p>	<p>11</p>



POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
	<p><b>Mason County:</b> Opposed</p> <ul style="list-style-type: none"> <li>• Policies outside of adaptive management</li> <li>• Water rights removals from municipalities and Group A systems</li> <li>• Policies without sunset clauses</li> <li>• Policies that abdicate local control to state agencies</li> <li>• Policies that transfer local funds to state agencies</li> <li>• Policies that would add additional elements to the comprehensive plan</li> <li>• Projects with low feasibility</li> <li>• Policies inconsistent between WRIA's 14 and 15</li> <li>• Additional regulation without quantifiable positive impact</li> <li>• Policies that increase housing shortages</li> <li>• Policies not required by law</li> <li>• Policies that set the stage for litigation</li> </ul>	<p><b>King County:</b> Without metering, people don't know how much they are using. We can already go to 350/ gal in drought.</p> <p><b>KPUD:</b> My concern is that my experience leads me to believe this is essentially a non-starter. The rule/law for permit exempt wells would have to be changed. The current rule may have flaws, but there would be too much opposition to changing it from the public. I've been at many a public forum when the subject comes up and emotional testimony from the public shoots it down quickly.</p>		
<b>P45 - Instream Flow Rule + Trust Water Rights Program (King County + Squaxin)</b>	<p><b>KPUD:</b> I understand the need to protect stream flows for future beneficial uses and the ISF rule may be the best tool for the job. Yes, the ISF levels were set using out-of-date methods. However, this is Pandora's box. If I could have the assurance that the ISF levels would be based on how much water is physically available in the drainage basin from precipitation instead of what is needed, desired or hoped for, I would be all for this. But I think the proposal will result in protracted legal battles as seen in other WRIAs. The proposal says it "may" effect future development. It WILL effect future development.</p>	<p><b>City of Bremerton:</b> Our recommendation is to prioritize and revise instream flows that are known to be wrong or questionable, especially given the uncertainty of rule-making outcomes.</p> <p><b>Ecology:</b> Note that rulemaking is a public process and comments from all entities and all locations from across the state are considered equally. The decision to embark on rulemaking is at the discretion of the Director and there is no guarantee of the outcome.</p> <p><b>Skokomish Tribe:</b> Should be accompanied by increased PEW fees, limits, and metering.</p> <p><b>Squaxin Island Tribe:</b> This proposal was combined with Squaxin Island Tribe</p>	<p><b>Kitsap County:</b> No objection to updating instream flow rule. We would need to explore the County's role in the water rights aspect. Suggest splitting into two proposals.</p>	11

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	<p><b>Mason County:</b> Opposed • Policies outside of adaptive management • Water rights removals from municipalities and Group A systems • Policies without sunset clauses • Policies that abdicate local control to state agencies • Policies that transfer local funds to state agencies • Policies that would add additional elements to the comprehensive plan • Projects with low feasibility • Policies inconsistent between WRIA's 14 and 15 • Additional regulation without quantifiable positive impact • Policies that increase housing shortages • Policies not required by law • Policies that set the stage for litigation</p>	<p>proposals. I believe King County is ok with taking it off the table.</p> <p><b>PGST:</b> We have many small basins which are closed year round. I am unclear whether these basins are still available for new groundwater rights, or are only closed to surface water rights. An IFIM model may be appropriate way to set an instream flow level for a particular stream, but it may be wise to retain closed status of small basins. Will need to consider further.</p>		
P46 - Recycled Water (King County)	0	4	7	11

POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
		<p>management or sunset clauses • Public conservation outreach especially if Tribal sponsored • Reuse of purple water for irrigation • Purple water for aquifer recharge • Policies that are consistent across WRIA 14, 15</p> <p><b>Ecology:</b> Note regarding considerations for Ecology workload.</p>		
<b>P47 - Water Laws (King County)</b>	<p>1</p> <p><b>Mason County:</b> Opposed • Policies outside of adaptive management • Water rights removals from municipalities and Group A systems • Policies without sunset clauses • Policies that abdicate local control to state agencies • Policies that transfer local funds to state agencies • Policies that would add additional elements to the comprehensive plan • Projects with low feasibility • Policies inconsistent between WRIA's 14 and 15 • Additional regulation without quantifiable positive impact • Policies that increase housing shortages • Policies not required by law • Policies that set the stage for litigation</p>	<p>2</p> <p><b>Squaxin:</b> This proposal was revised based on discussions with the Squaxin Island Tribe. A revised version was provided on August 7th.</p> <p><b>City of Gig Harbor:</b> This proposal seems like a challenge in regards to funding.</p>	8	11
<b>P48 - Beaver Package (Beaver Task Force)</b>	<p>2</p> <p><b>Mason County:</b> Opposed • Policies outside of adaptive management • Water rights removals from municipalities and Group A systems • Policies without sunset clauses • Policies that abdicate local control to state agencies • Policies that transfer local funds to state agencies • Policies that would add additional elements to the comprehensive plan • Projects with low feasibility • Policies inconsistent between WRIA's 14</p>	<p>3</p> <p><b>King County:</b> Support the concept, but additional funding to implement may prevent action.</p> <p><b>Kitsap County:</b> Need to specify that easements are voluntary and are a market-based system. Supports Kitsap Water as a Resource and species recovery plans. Supports water quality improvement plans. Recharge potential is high, if well-implemented.</p>	6	11

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	and 15 • Additional regulation without quantifiable positive impact • Policies that increase housing shortages • Policies not required by law • Policies that set the stage for litigation <b>City of Bremerton:</b> Labor intensive.	<b>Squaxin:</b> Please consider including another item: "review County ordinances for improvements to support management of beaver-landowner interactions"		
<b>CROSS-WRIA - Water Conservation Education Program</b>	0	4 <b>Kitsap County:</b> Support contingent on adequate funding. <b>Mason County:</b> Resistant • Policies that encumber county resources • Policies that place higher costs to homeowners • Policies that reduce implementation of low income housing • Policies/projects without timelines for implementation • Research funded solely by the county • Policies not required by law <b>Port Gamble S'Klallam Tribe:</b> Water conservation is a good thing but its not a silver bullet. <b>Squaxin Island Tribe:</b> This proposal was revised based on Squaxin Island Tribe review. A revised version was provided on August 7th. An updated version customized for WRIA 15 is available.	7	11
<b>CROSS-WRIA - Water Conservation Statewide Policy</b>	0	3 <b>City of Bremerton:</b> How would these limits be tracked & enforced without metering? We suggest a drought response focused on education and recommendations to the public. <b>Kitsap County:</b> Generally support but seems more like state role than county.	8	11

POLICY TITLE	Yes - including this proposal may cause my entity to block or not approve the plan	Yes - the concept of the proposal is fine, but revisions are needed	No - this proposal is good to go!	Total
		<b>Mason County:</b> Needs more thought. It's vague and unfunded. Leaning towards saying no since it crosses legislative boundaries and sets the stage for moving from recommendation to legislation to litigation.		