



AGENDA

WRIA 15 Watershed Restoration and Enhancement Committee Meeting

October 1, 2020 | 9:30 a.m.-3:00 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
- September Meeting Summary- Revised
- Discussion guides: Comments on Chapter 4 and Compiled Plan; NEB Evaluation; Consumptive Use Estimate
- Project Workgroup Updates and Recommendations
- Adaptive Management Draft Section
- Responses to Salmon Recovery Portal Questions

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](#), [Revised September 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- Chapter 4 and Compiled Comments for Discussion](#)

- Review and discuss outstanding comments on Chapter 4
- Review and discuss comments on compiled draft plan
- Discuss how to capture differing interpretations of the law or disagreement on plan components
- Next steps

Break

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

Projects

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

Handout: [Project Workgroup Updates and Recommendations \(coming after 9/28\)](#), [Discussion Guide on KPUD Stream Augmentation](#)

- Offset projects – status and outstanding needs
- KPUD Stream Augmentation Project
- Projects to include for NEB
- Presentation of project list
- Next steps

Break

12:30 p.m. | 20 minutes | All

Policy Recommendations

12:50 p.m. | 60 minutes | Susan Gulick, All | Discussion

Handout: [Draft of Chapter 6 of Plan](#); [Google Slide from Sept 28 Open House \(coming after 9/28\)](#)

- Review and discuss draft plan language on revised policy proposals
- Update from “Open House” to discuss blocked policy proposals
- Discussion/Next Steps

Adaptive Management

1:50 p.m. | 20 minutes | Susan Gulick, All | Discussion

Handout: [Updated Adaptive Management Section](#)

- Review comments on draft section
- Discussion and next steps

Break

2:10 p.m. | 5 minutes | All

Outstanding Plan Elements: Consumptive Use Estimate and NEB Evaluation

2:15 p.m. | 30 minutes | Susan Gulick, All | Discussion

Handout: Discussion Guides on [Consumptive Use](#) and [NEB Evaluation](#) (Chapter 7)

- Discuss how to present consumptive use in plan:
 - Agree to a range? Agree to a specific number?
- Does Committee want to include an NEB evaluation chapter?
- Discussion and next steps

Public Comment

2:45 p.m. | 5 minutes | Susan Gulick

Next Steps and Action Items

2:50 p.m. | 10 minutes | Susan Gulick, Stacy Vynne

- Next meeting—Thursday, October 29 (**Special Meeting**), 9:30 a.m. – 12:30 p.m. (anticipated) Webex

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

WebEx Information

Access code: 133 462 7924

Meeting password: WRIA15Comm

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Access code: 133 462 7924



MEETING SUMMARY

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

Committee Chair

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

Handouts

- Agenda
- Comments on Chapter 4 discussion guide
- Policy proposals survey results
- Adaptive Management chapter draft

Attendance

Committee Representatives and Alternates *

Joel Purdy (*Kitsap Public Utility District*)
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*)
Nam Siu (*alternate- WA Dept of Fish & Wildlife*)
Austin Jennings (*alternate - Pierce County*)
Dan Cardwell (*Pierce County*)
Dana Sarff (*alternate - Skokomish Tribe*)

Seth Book (*alternate - Skokomish Tribe*)
Paul Pickett (*alternate - Squaxin Island Tribe*)
Randy Neatherlin (*Mason County*)
Russ Shiptet (*Kitsap Building Association*)
Sam Phillips (*Port Gamble S'Klallam Tribe*)
Mike Michael (*City of Bainbridge Island*)
Larry Boltz (*Mason-Kitsap Farm Bureau*)
Dave Windom (*Mason County*)
Alison O'Sullivan (*Suquamish Tribe*)
Bri Ellis (*City of Gig Harbor*)
Nathan Daniel (*Great Peninsula Conservancy*)
David Winfrey (*Puyallup Tribe*)

Other Attendees

Susan Gulick (*Sound Resolutions, Facilitator*)
Angela Pietschmann (*Cascadia, Info Manager*)
Bob Montgomery (*Anchor QEA*)
Joel Massmann (*Suquamish Tribe*)

John Covert (*Ecology*)
Mike Noone (*Ecology*)
Stephanie Potts (*Ecology*)

Committee Representatives Not in Attendance*

City of Poulsbo

Washington Water Service (ex-officio)

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

Meeting Agenda and August Meeting Summary

Susan Gulick (Facilitator) reviewed the agenda. *No changes*. Stacy Vynne McKinstry (ECY – Chair) reviewed revisions to the August meeting summary. *Summary approved*.

Reference Materials

- [Approved August Meeting Summary](#)

Updates and Announcements

Stacy provided the following updates:

- Updated Ecology furlough dates: [9/25/20](#), [10/30/20](#), [11/30/20](#).
- The Adaptive Management sub-group met on 9/2; will discuss later in agenda.
- The Project Workgroup will meet on 9/22 and possibly 9/28 if needed. The meeting(s) will focus on water rights, project list refinement, and projects to include for NEB.

Plan Development

Ecology is developing a template presentation that Committee members can share with their respective entities, along with the WRIA 15 watershed plan and Committee Brochure. [Stacy shared](#) key points for Committee representatives to convey to decision-makers as they start to review the plan include:

- The plan must address indoor and outdoor household water use from new permit-exempt domestic groundwater withdrawals over the 20 year planning horizon: January 19, 2018 – January 18, 2038.
- The plan is required to provide water offset for consumptive use amount and achieve NEB (min. requirement). NEB is evaluated at the WRIA scale.
- The plan must include projects and actions to offset new consumptive water use and the offsets must continue as long as well pumping continues (i.e. projects must provide benefits in perpetuity).
- “Projects and actions identified in watershed plans are not limited to those that can provide strict in-time, in-place offsets, though projects in the same sub-basin or tributary (within the same WRIA), and during the same time that the use occurs are prioritized” (NEB Guidance).
- Plan does not obligate entities to implement projects or actions, but entities can self-obligate and the Committee may make recommendations.
- All Committee members must vote to approve the plan in order for it to go to Ecology for review, NEB determination and considered for adoption. If the Committee does not approve the plan, Ecology finishes the plan, submits to SRFB for technical review, finalizes the plan, and then the Director may initiate rulemaking. Rulemaking is a statewide process, open to statewide input.

Stacy reviewed outstanding comments on Chapters 1 and 4 in detail (see discussion below). The Committee will continue to work on additional plan elements till early November. A second (complete) draft plan will be shared in early November with a quick review turnaround. We are aiming for finalized draft available in early December for local review and approval process.

Reference Materials

- [WRIA 15 2020 Work Plan](#)
- [Local Approval Process for WRE Plan](#)
- [WRIA 15 WRE Committee Brochure](#)
- Template presentation (in development)
- [Discussion Guide: Proposed Revisions to WRIA 15 Watershed Restoration and Enhancement Plan Chapters 1 and 4](#)

Discussion (by proposed revision):

- **Pierce County: Line 62** – *“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?”*

- Committee did not object to this revision. Stacy will address with other considerations (see below) on uncertainties and limitations.
- **WDFW: Line 72** – *“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.”*
 - **Squaxin Island Tribe** would like the committee to further discuss how a safety factor could address concerns around uncertainty of growth/other projections.
 - **Mason County** would like to use the medium growth projection to align with their Comprehensive Plan. They would not consider a safety factor in addition to using the high growth projections. **Kitsap County** agrees.
 - **Ecology** will highlight unresolved considerations in plan. As the Committee continues to discuss projects, they will revisit potential safety factors and choice of growth projections in broader context of the consumptive use and projects chapter (further discussion in October).
- **WDFW: Line 81** – *“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.”*
 - **King County’s** PE well growth projections were 83% greater than the actual number of PE wells installed from Jan 2018 to June 2020.
 - **Kitsap County** noted residential zoning in rural areas requires a Comprehensive Plan change (not something that happens ad-hoc).
 - **Suquamish Tribe** noted to be compliant with the Growth Management Act, most growth should be focused in Urban Growth Areas, which would be on public water systems. Don’t imply unrestricted rural growth in WRE Plan.
 - **Pierce County’s** projection methods did not rely on underlying zoning information, just historic PE well trends.
 - **Mason County** does not support including this language in WRE Plan.
 - **Ecology** will discuss with technical consultants and county reps to work on language. Stacy will address with other considerations on uncertainties and limitations. We want to recognize assumptions to inform future adaptive management but we do not want to undermine our plan by including so many caveats.
- **PGST: Line 204** – *“We need to acknowledge the uncertainty in the assumption that 90% of indoor use returns to the 'immediate water environment' via septic drain field. While the water may enter the drain field 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.”*
 - **PGST** would like to acknowledge the assumption that indoor water use is 10% consumptive because it is not well verified in literature. Include language explaining this is a working number and additional context.
 - **Ecology** recommends using the 10% assumption (aligned with USGS).

- **City of Port Orchard** suggested including a statement in the Adaptive Management chapter of the plan to address PGST's concern (i.e., if better data/assumptions emerge).
 - **Pierce County** would like to avoid undermining the plan with caveats on every number included in plan (all estimates). **Mason County** agrees.
 - **Squaxin Island Tribe** ~~and~~ believes it's scientifically robust and transparent to document assumptions – a list of terms used could be noted. The projection of consumptive use for the next 20 years is a critical item, although in the end the entire plan is a package where consumptive use is balanced with projects, policies, and adaptive management.
 - **Skokomish Tribe** would like to strike a balance between including context on assumptions and not undermining plan.
 - **Ecology** will work with technical consultants to discuss how the Adaptive Management chapter could address some of these concerns. Stacy will include clear statement around the assumptions and resources.
- **PGST: Line 210** – *“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.”*
 - **Ecology** will note the USGS model uses metered water system data.
 - **WDFW: Line 214** – *“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.”*
 - **Ecology** will flag comment for consideration as part of overall uncertainty/assumptions discussion (potentially include/acknowledge in Adaptive Management chapter). See notes above.
 - **PGST: Line 234** – *“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.”*
 - The Committee agreed to include an overarching statement/language in the plan that broadly addresses uncertainties, assumptions, averages, and past trends used to develop estimates in the plan (potentially in Adaptive Management chapter). See relevant comments and notes above.
 - **Pierce County: Line 236** – *“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.”*
 - Committee did not object to this revision. Ecology will work with technical consultants to include additional presentations of data.
 - **Squaxin Island Tribe: Lines 5-7** - *“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- exempt withdrawals. This underestimate calls into question the entirety of Chapter 4 and undermines the statutory mandate to restore and enhance streamflows."

- **Ecology** will work with tribes (and other entities if applicable) to discuss how to capture different interpretations of the law.
- **Squaxin Island Tribe:** "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.""
 - **Kitsap, Mason, and Pierce Counties** object to this framing/language.
 - For Kitsap, "high" and "low" estimates are an assumed +/- 5% margin of error from the actual growth target ("medium").
 - Mason County uses OFM's medium growth projections.
 - Pierce County's estimates are based on a set period of time in the past.
 - [Squaxin Island Tribe noted that there was a distinction between how the numbers were developed versus what they mean for our projections to the future.](#)
 - **Ecology** will work with technical consultants and counties to ensure high, medium, and low are accurately defined for each county. There remains an outstanding comment on whether we include a general description/definition for how we are presenting the high/med/low scenarios in the plan.

The Committee ran short on time for this discussion and will continue to discuss open comments on Chapter 4 during the October Committee meeting.

Projects

Stacy provided an update on **water right acquisition opportunities:**

- Ecology received draft descriptions for 13 water rights from PGG last week.
- Committee members need to review and flag (1) concerns; (2) which rights to move forward.
- Ecology Water Resources staff are reviewing for red flags, but PGG believes these 13 have the best potential. Joy (KCD) shared that a number of the water rights are of concern because they are in use for agriculture. Stacy will follow up with Joy.
- Ecology is working with King County to identify more opportunities on Vashon-Maury.
- Current list is speculative; looking for committee feedback before discussing with landowners.

Bob Montgomery (Anchor QEA) provided updates on several projects:

- **Belfair Wastewater Treatment Plant:** technical team had a call with Mason County and Squaxin Island Tribe to discuss. Belfair has Class A wastewater treatment and currently sprays the water onto a field adjacent to the treatment plant. Technical team is reviewing to determine whether this water could provide an offset ([increasing](#) infiltration or exchanging [for a](#) current water right).
- **Winslow Wastewater Treatment Plant:** the City of Bainbridge Island needs to upgrade this WWTP to meet new discharge requirements for Puget Sound. Potential to use treated wastewater on island to offset/replace current recharge. In preliminary development (no timeframe for implementation yet).

- **Bear Creek Forest Stand Rotation:** Great Peninsula Conservancy is considering acquiring forested areas with intent to increase rotation from 40 years to 80+ years (or place into permanent trust). GPC interested in acquiring parcels in Newbury Woods and Bear Creek. Under initial discussion and review (project limitations).
- **Mason County Rooftop Infiltration:** under review by Mason County. Stacy will distribute when ready.
- **Miller Road MAR project:** location of project is close to the mouth of Manzanita Creek and Puget Sound. Need to determine benefit to streamflow given proximity to Sound (how to translate into PE well offsets).
- **M&E Farms Storage MAR project:** preferred to downstream Miller Road MAR project (more benefits to streamflow, no water rights issues, captures stormwater recharge).

Two projects in the inventory were flagged by Ecology Water Resources staff as **potential Foster conflicts (source switches in closed basins)**. Stacy is working with technical consultants and project proponents to attempt to revise, but may need to drop projects:

- **Gig Harbor Golf Course/ Artondale Creek:** surface to groundwater change is challenging to approve without mitigation to account for new hits on the stream that will now be felt during the non-irrigation season (if the surface water body is either closed or instream regulated). Depending on the depth of the new well and the distance from the original point of diversion, there may be new impacts on adjacent regulated water bodies that could make processing difficult.
- **Johnson Farm, Bainbridge Island:** no immediate water right processing concerns associated with the stormwater management/infiltration/MAR part of the proposal. The surface to groundwater challenges may face the same challenges as described in the Gig Harbor project above, depending on the regulated status of the subbasin where the pond is located (i.e., where would the water go if it were not collected in the pond) and the distance from the diversion location and well depth for the new point of withdrawal. It's likely that this could impair adjacent regulated water bodies and therefore require mitigation.

Joel Purdy (KPUD) provided an update on the **KPUD stream augmentation project:**

- KPUD has put forward a project to augment streamflow at several potential sites. KPUD would add water to streams within their service area using their existing water rights (spans across the watershed). Diverts groundwater that would otherwise have gone to homes indirectly into streams, especially during summer low flows. Supports fish and habitat.

Reference Materials

- [Updates on water rights](#)
- [Updates on detailed project descriptions](#)
- [KPUD stream augmentation project](#)
- [Status of projects and offsets by subbasin](#)

Discussion

- **Suquamish Tribe** has concerns (temperature / personal care products) with direct discharge of purple pipe water to streams/wetlands. For augmentation, water should be infiltrated (not injected). It needs to be Class A water. Tribe is on the fence regarding augmentation projects (ok if infiltration happens prior to augmentation). Uncertain about offset estimates.
- **City of Port Orchard** noted data related to contaminants of emerging concern (CECs) and their effects on aquatic systems is limited. Regarding infiltration, the vadose zone needs to be deep

enough to provide adequate treatment for recycled water to prevent groundwater contamination.

- **Belfair Wastewater Treatment Plant:**

- Squaxin Island Tribe noted that this project has two components (1) increasing the amount of infiltration the plant provides and (2) increasing the number of hookups. To get infiltration benefits, need more hookups. Need details on where industrial plant operates [for a potential "purple pipe" project](#). [Maybe also talk to the fish center](#) to see if there is a source replacement opportunity.
- Bob Montgomery (Anchor QEA) noted Mason County is concerned with cost as they are already struggling to pay for an expensive facility.
- Anchor QEA is meeting with Mason County to follow up. Stacy can follow up with Hood Canal Salmon Enhancement Group if appropriate to discuss the water rights.
- Could be included in plan as a potential future project if information is not gathered in time for approval.

- **Mason County Rooftop Infiltration:**

- Bob Montgomery (Anchor QEA) noted the potential offsets from this project are "above and beyond" what is required by Ecology's stormwater manual (outside of UGAs/urbanized areas based on population density). Mason County has not adopted Ecology's stormwater manual for rural areas.
- HDR and Mason County are working together on offset estimates. Ecology will circulate the technical memo on this proposal with additional detail when it's ready.

- **Gig Harbor Golf Course:**

- Squaxin Island Tribe identified potential for a restoration project on nearby patch of unused land (e.g., mini MAR; reduce summer pumping by storing water from winter in pond from winter).
 - Bob Montgomery (Anchor QEA) noted the golf course does have a pond to pump to / pump out of but unsure how it affects diversion.
- Ecology noted this project could be retained on inventory as a potential option if the law changes in the future.

- **Skokomish / Bremerton projects:**

- The City of Bremerton was approached by Skokomish Tribe and Aspect Consulting to determine feasibility of reclaimed water and stormwater infiltration projects in the city. High salinity is a challenge for reclaimed water projects, based on feasibility studies. The City is open to further conversations with Aspect and Skokomish Tribe.
- Skokomish Tribe and Aspect also in preliminary conversations with Gold Mountain Golf Course (owned by City).
- Suquamish Tribe requested to be included in reclaimed water discussions within the City of Bremerton (within the Tribe's U&A).

- **KPUD stream augmentation project:**

- Great Peninsula Conservancy is looking to acquire 240 acre parcel on Little Anderson Creek. KPUD noted this parcel would be relevant to the Silverdale reclaimed water expansion project.
- Squaxin Island Tribe is concerned by potential far field effects of groundwater (i.e., augmenting one creek/subbasin but creating problems for others). [Similar to the issue raised with Artondale Creek project](#). [Also, trying to offset PE wells by pumping from a deeper well with broader effects, using inchoate water rights, is like "robbing Peter to pay Paul"](#). Suggest keeping on list but with Committee concerns noted. [More discussion is needed](#).
 - Ecology did not identify red flags from a water resources/rights perspective; KPUD would be using existing water right (contrary to Artondale source switch).

KPUD has a water right in good standing and could choose to serve more customers with it or augment streamflow (volunteering to augment streamflow). Augmentation considered a municipal purpose (not change in use designation).

- Skokomish supports clean, usable water being discharged to Little Anderson Creek (has salmon streams) as a benefit to the North Hood Canal subbasin (short on projects). However, concerned about using groundwater to make up for impacts happening currently or future. Support reusing water; deeper aquifer needs protection.
- Port Gamble S'Klallam Tribe supports this project; small quantity relative to what's already being produced out of the same aquifer.
- Suquamish Tribe noted the annual cost of this project was estimated to be \$8,000 per year and KPUD is willing to cover costs after 20 years. How would this agreement be memorialized? KPUD unsure at this time.
- Kitsap County is on the fence; comes across as band-aid solution that does not address the core problems causing degradation of streamflow. Concerned about potential long-term consequences and public perception.
- WDFW also on fence; will need to check with headquarters.
- Ecology will work on developing a discussion guide with additional context to help address concerns at October Committee meeting and determine whether or not to include the project for its offset benefits.
- **Project Inventory:**
 - Kitsap County proposed including a section in plan for projects considered but not selected for inclusion in the WRE Plan, with rationale. List would be available for reference/consideration in future.
 - Ecology envisions the body of the Plan including a summary of projects needed to meet offset and NEB requirements (approved by Committee) but retaining the full project inventory in appendix to potentially pursue in future.
 - Kitsap Conservation District has five additional raingarden/stormwater projects for consideration in the West Sound Subbasin. Joy to connect with Stacy and Burt.
 - Kitsap County would support measurable water infiltration; (voluntary) retroactive fixes on existing properties.
 - Squaxin Island Tribe requested additional detail on how offsets were calculated [and how uncertainty was addressed](#) for projects in inventory. Concerned by list of projects in South Sound (a lot of uncertainty).
 - Ecology can circulate detailed project descriptions for feedback. [Some numbers are a "best guess". Ecology wants "reasonable assurance"](#). Committee must determine and agree upon reasonable offset assumptions for inclusion in plan. Current offset benefits based on best professional judgement and available resources.

Adaptive Management

The Committee discussed the key sections of the Adaptive Management Chapter, drafted based on 9/2 Adaptive Management Subgroup meeting.

Reference Materials

- [Adaptive Management Chapter Draft](#)

Discussion

- **Project, Policy, and PE Well Tracking**

- The Committee does not support putting the burden of WRE Plan project related data stewardship on Salmon Recovery Lead Entities.
 - [Squaxin Island Tribe believes the Committee needs to decide who the data steward might be. This could be linked to the question of an implementation group.](#)
- Ecology will clarify the questions from the Adaptive Management Subgroup / Committee with WDFW (Tristan) regarding the Salmon Recovery Portal (SRP):
 - Will SRP include measuring project effectiveness (i.e. estimating offset)?
 - How will the data stewards be funded/maintained over the long-term?
 - Who will manage this effort over the long-term? Is WDFW prepared to do that?
 - How easy will it be to download information from the SRP to include in the WREC reports (see below)?
- **Monitoring & Research**
 - Susan will continue drafting this section of the chapter.
- **Reporting**
 - Susan will update draft to remove language implying any additional work for counties. Updated language will simply acknowledge what reporting counties are already required to do under the law. If Committee members would like counties to do additional reporting, those members need to propose language to be discussed by the Committee. Recommendation will focus on how Ecology should compile and present the information provided by counties.
 - Squaxin Island Tribe [disagrees with removing a county role for reporting. They](#) may submit recommendations for additional county reporting for Committee review.
- **Oversight & Adaptation**
 - Port Gamble S’Klallam Tribe would like a reference to reviewing streamflow status and trends in this section (every five years). Sam Phillips noted that the monitoring component refers to collection of data while the adaptation piece includes the review of that data to determine whether goals are being met and taking action as needed.
 - The Committee supports continuing to convene the participating WRIA 15 Committee entities regular (predetermined intervals). Facilitation team will work on updating language in draft chapter with planned (1) brief annual meetings (by phone); (2) more in-depth meetings every five years; and (3) examples of what would be covered at each interval. The Committee may decide to meet more frequently during annual and 5-year check-ins.
 - Mason County supports an entity like the Chehalis Basin Partnership leading this effort going forward.
 - Kitsap County requested more specificity in Table 2 (first row) on what counties are expected to provide input on.
 - Pierce County is interested in determining the process for amending plans into the future. Ecology noted that while no action is *required* after June 2021, nothing holds the Committee back from meeting in the future or self-obligating. WRE Plans for WRIAs 1 & 59 had reporting requirements but did not include consequences for failing to meet requirements. The WRIA 15 Committee, however, could make a recommendation.
- **Funding**
 - The Committee needs to have a discussion on funding (in addition to this request to the legislature) for plan implementation. Items to be discussed include (1) increasing fees for wells; (2) inter-local agreements.
 - The Committee requested removal of language asking the legislature to provide a structure to monitor plan implementation.

Policy Recommendations

Stacy noted that including policy and adaptive management recommendations in the WRE Plan is above and beyond the requirements of the law and puts the Committee at risk of not reaching completing the plan or reaching agreement (due to the time needed to negotiate and work through concerns).

Proposed next steps for policy and adaptive management proposals (based on survey results):

- **Proposals with no issues flagged by Committee** were included in draft plan (only the well tracking database improvements proposal fell into this category).
- **Proposals flagged by Committee for refinement** will need collective input. The Committee and facilitator will work on revisions to the extent there is time for review during October and November Committee meetings. Stacy and Susan will work on revisions and bring back to the Committee for discussion in October.
- **Proposals with red flags/blocks from Committee** will no longer have dedicated Committee meeting time for discussion. Proposal proponent can work one on one with the entities that flagged the proposal and bring the revised proposal back to the committee in October or November if concerns are resolved.

Reference Materials

- [WRIA 15 Policy Proposal Tracker](#)
- [Summary of Survey Results](#)

Discussion

- [Squaxin Island Tribe's "County Policies to Promote Connections to Group A systems"](#) proposal was not included in the survey. Paul Pickett will send an email with the proposal to the Committee asking for input.
- [Squaxin Island Tribe asked if entities who expressed "blocks" on proposals were willing to continue discussions.](#)
 - [Several members said they would be willing to discuss them.](#)
 - [Members discussed the idea of a subgroup meeting to continue discussion on proposals.](#)
 - [Squaxin Island Tribe will pursue 1:1 conversations before the subgroup meeting.](#)
 - [Ecology and Susan will work on next steps.](#)

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Update since the Committee meeting

- *Ecology/facilitation team will distribute an invite to full committee for 9/28 to determine whether the proposals (1) can be revised and included in the Plan or (2) should be removed from list. Attendance from proposal proponents and Committee members who opposed the proposals especially important.]*

Public Comment

No public comment.

Upcoming Meetings

- Next Committee meeting: Thursday, October 1, 2020, 9:30 a.m., Webex
- The Project Workgroup will meet on 9/22 and possibly 9/28 if needed. The meeting(s) will focus on water rights, project list refinement, and projects to include for NEB.
- Policy/Adaptive Management proposal discussion on 9/28 to determine whether the proposals (1) can be revised and included in the Plan or (2) should be removed from list.

Action Items for Committee Members

- Review and provide comments on Draft WRE Plan by 9/21/20.
- Paul Pickett to send email with Squaxin's "County Policies to Promote Connections to Group A systems" proposal to the Committee asking for input.

Action Items for Ecology and Consultants

- Distribute Mason County's checklist for approving/not approving policy and adaptive management proposals in WRE Plan.
- Update WRE Plan Chapters 1 and 4 based on Committee feedback.
- Update Adaptive Management Chapter Draft.
- Once competitive streamflow grants are awarded, share with the Committee whether the Nisqually application to fund planning was selected.
- Develop KPUD stream augmentation project discussion guide for October Committee meeting.
- Stacy and Burt to connect with Joy/Kitsap Conservation District on additional projects for consideration in the West Sound Subbasin.
- Provide detail on how project offsets were calculated in inventory (i.e., detailed project descriptions).

Discussion Guide: Proposed Revisions to WRIA 15 Watershed Restoration and Enhancement Plan Chapter 4 and Draft Compiled Plan

WRIA 15 Committee Meeting October 1, 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 comments that Ecology has highlighted for committee discussion as they are more than a correction or clarification.

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. Ecology prepared a draft compiled plan (Chapters 1-7) 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>. The direct link to the August compiled plan and comments is available on Box: <https://ecy.box.com/v/WRIA15Aug2020CompiledDraftPlan>. Ecology reviewed the comments on the initial draft of Chapter 4 and the compiled draft plan and is incorporating comments that correct or clarify content into the second draft plan. Below we present the outstanding comments 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 the compiled draft plan?

Note that other entities are still completing their review of the draft chapters. Comments received after 9/23 will be brought forward to the next committee meeting.

Proposed revision	Associated content	Entity	Considerations
There should be a section in the report that addresses the Section 203 provisions that list the Ecology findings and plan evaluations/estimations described in Section 203(c), (d) and (e) that extend beyond new domestic permit-exempt wells.	Overall plan content	Squaxin Island Tribe	See note below re: different interpretations of the law.
quote the mandatory requirements verbatim from RCW 90.94.030(b) – (e) rather than paraphrasing it and omitting material mandatory components. This sentence is a misstatement of what the law requires. The law requires offsetting existing domestic PEWs too, at least dating back to when ISFs were adopted, plus estimating cost of offsetting all new domestic water uses over 20 years.	Introduction to the plan purpose. Chapter 1, Lines 8-10.	Squaxin Island Tribe	This section provided by Ecology management. Unlikely they will allow changes. See note below re: differing interpretations of the law.
This sentence is an overly restrictive interpretation of what the law requires - offsets must include existing permit-exempt wells.	Overview of the plan purpose. Chapter 1, Lines 80 - 83	Squaxin Island Tribe	This section provided by Ecology management. Unlikely they will allow changes. See note below re: differing interpretations of the law.
This sentence is an overly restrictive interpretation of what the law requires - offsets must include existing permit-exempt wells.	Requirements of the plan. Chapter 1, Lines 99-101	Squaxin Island Tribe	This section provided by Ecology management. Unlikely they will allow changes. See note below re: differing interpretations of the law.
Clarify what projected uses must encompass. See RCW 90.94.030(3)(e) - estimates of the cumulative consumptive water use impacts over 20 years.	Requirements of the plan. Chapter 1, Lines 115-117	Squaxin Island Tribe	This section provided by Ecology management. Unlikely they will allow changes. See note below re: differing interpretations of the law.
This sentence is an overly restrictive interpretation of what the law requires - offsets must include existing permit-exempt wells.	Requirements of the plan. Chapter 1, Lines 118-121	Squaxin Island Tribe	This section provided by Ecology management. Unlikely they will allow changes. See note below re: differing interpretations of the law.

Add language about legal requirements for critical areas and the Counties' adoption of critical area ordinances.	County planning efforts (GMA, Comp Plans, etc) Chapter 2, Line 419	Squaxin Island Tribe	Discuss with counties.
Include a table that lists the streams categorized by subbasin, and by annual or seasonal closure, and by ISF limits set.	Instream flow WAC overview. Chapter 2, Line 513	Squaxin Island Tribe	Ecology was concerned about providing too much detail on ISF, but would be okay including a table in appendix.
Add a count of the listings for temperature, DO, pH, and TP (the impairments most likely to be worsened by low flows). Also add a footnote with a link to Ecology's assessment webpage.	Overview of water quality in WRIA 15. Chapter 2, Line 592	Squaxin Island Tribe	Water quality is not part of this planning process. Would be okay adding in some resource links or information in the Appendix, but want to limit.
Comments from multiple entities regarding concern for a safety factor on top of the consumptive use estimate calculated using the irrigated areas method. Comments from other entities wanting to see a higher growth projection for some counties.	Chapter 4	Multiple	For discussion with committee at October meetings.
Several comments from initial draft of Chapter 4 regarding assumptions, uncertainties and limitations.	Chapter 4		Stacy is working on some reframing of the language for the next draft that will document assumptions without undermining the planning process. Recognize additional comments submitted on this topic with compiled plan review.
The first sentence of this paragraph quotes the law. Then the second sentence quotes guidance that misinterprets the law. Then the third sentence describes Plan contents that are less than even the first two sentences describe. This paragraph, and the Plan, should be revised to be compliant with the requirements of the law.	Chapter 4, Lines 642-649	Squaxin Island Tribe	Stacy is working on revisions and clarifications. See note below re: differing interpretations of the law.
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-exempt withdrawals. This underestimate calls into question the entirety of Chapter 4 and undermines the statutory mandate to restore and enhance streamflows.	Chapter 4, Introduction to projections for new wells.	Squaxin Island Tribe	This comment contradicts the Streamflow Policy Interpretation POL 2094 and Final NEB Guidance. For discussion at October meeting on how to capture differing interpretations of the laws or disagreement with plan elements.

<p>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.</p>	<p>This section is discussing uncertainties and assumptions of consumptive use.</p>	<p>Squaxin Island Tribe</p>	<p>For committee discussion.</p>
<p>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.</p>	<p>This section is discussing the irrigated area method for calculating consumptive use.</p>	<p>Squaxin Island Tribe</p>	<p>The workgroup and committee discussed and decided not to add a substitution for zero in fall of 2019. What would this information add?</p>
<p>WDFW does not support replacement of fish passage barrier water crossings (ie culverts and bridges) as mitigation or offset measures because these upgrades are already required by state statute. However, WDFW does support other habitat improvements related to water crossing replacements (such as floodplain reconnection) as mitigation or offset measures. Additionally, WDFW concurs that mitigation and offset funds could be used to help a water crossing project exceed the minimum water crossing requirements, resulting in a greater ecological lift.</p>	<p>Overview of projects and project inventory. Chapter 5 Line 959</p>	<p>WDFW</p>	<p>For discussion with workgroup and recommendation to committee on whether to remove projects that are primarily a culvert/barrier project from the project list.</p>
<p>Kitsap County has concerns over the stream augmentation proposals. The point of this plan is to infiltrate water to offset groundwater withdrawals and thereby increase streamflows. The augmentation projects withdraw deeper groundwater and dump it directly into streams to increase streamflows. This notion seems contrary to the plan itself, which states on page 1, "Pumping from wells can reduce groundwater discharge to springs and streams by capturing water that would otherwise have discharged naturally, reducing flows (Barlow and Leake, 2012)." Placing an extra draw on the deeper aquifer would potentially place stress on the system that would draw more water out of the shallow aquifer down toward the one being withdrawn from.</p>	<p>Overview of projects and specific projects to consider for offset benefit. Chapter 5 Line 1006</p>	<p>Kitsap Co</p>	<p>For discussion with Committee during KPUD Stream Augmentation agenda item.</p>
<p>Including proposed adaptive responses to offset deficits in this section may be helpful in providing context for a legislative request for funds and increase the likelihood that offset deficits can be managed in the future.</p>	<p>Adaptive management section. Chapter 6 Line 1245</p>	<p>WDFW</p>	<p>Okay to make revision unless concerns from committee.</p>

WRIA 15 Committee Discussion Guide: Kitsap Public Utility District Stream Augmentation Projects

October 1, 2020

Background

The Kitsap Public Utility District (KPUD) proposes a series of stream augmentation projects to support streamflow restoration efforts in WRIA 15. Members of the WRIA 15 Committee have raised concerns about the project. The Committee will need to determine whether to: 1) account for the offset benefit of the projects in the WRIA 15 watershed plan; 2) retain the projects on the “project inventory” and not account for the offset benefits, noting concerns and uncertainty expressed by Committee members for future consideration; or 3) remove the projects from consideration in the WRIA 15 watershed plan.

Overview of the Project

This project provides a direct “water for water” offset for future PE wells by discharging water to streams to augment streamflows. KPUD would operate within their existing water right, voluntarily lowering the amount of water KPUD has to serve customers in the future. Ecology’s Water Resources program has reviewed the project and does not have concerns from a water rights perspective. Site selection for augmentation is based on anticipated PE well growth, fish critical streams, and proximity to existing infrastructure. Water quality concerns would be addressed through de-chlorination and aeration. Table 1 lists the streams proposed for augmentation and the potential offset benefits for each project. KPUD is a willing sponsor and is ready to implement once funding is received. A detailed project description is available in the [projects folder on Box](#).

Table 1. Potential Stream Augmentation Sites

KPUD Water System	WRIA Subbasin	Augmented Stream	Potential Augmentation Amount		
			AFY	GPM	CFS
Stavis Creek	North Hood Canal	Stavis Creek	0 ¹		
Newberry Hill	North Hood Canal / West Sound	Little Anderson/ Chico Creeks	100 ²	62	0.138
Seabeck	North Hood Canal	Seabeck Creek	100 ²	62	0.138
West Kitsap	North Hood Canal	Big Beef/Seabeck	100 ²	62	0.138
Gala Pines	West Sound	Dogfish Creek	40	25	0.055
Brianwood	West Sound	Clear Creek ³	12	7.5	0.017
Avellana	West Sound	Clear Creek ³	10	6	0.014
Keyport	West Sound	Multiple creeks	100 ²	62	0.138
Long Lake	West Sound	Curley Creek	40	25	0.055
Strawberry Hill	West Sound	Strawberry/Curley?	45	28	0.062
Indian Hills	West Sound	Stream 202	85	53	0.117
Driftwood Cove	West Sound	Fragaria Creek	15	9	0.021
Totals			647	401.5	0.4.893

Notes:

1. Water Right currently being processed, there is potential for stream augmentation to be added to water right conditions.
2. The listed volume was arbitrarily selected and there is potential for additional augmentation volume.

3. The nearest water main to a tributary of Clear Creek is 500 feet, for the small volumes available this project may not be feasible.

Project Benefits

- The project provides a water for water benefit, where the sponsor can direct water into fish critical streams that are most likely impacted by PE wells and at the time water is most needed.
- The project operates within KPUD's existing water right; they are voluntarily giving up part of the water right for augmentation as opposed to reserving it to serve future homes.
- The project has a willing project sponsor that can work with the Committee to shape the project to meet our needs and goals.
- The project is relatively low cost for the benefit compared to other projects that require significant infrastructure.
- KPUD's water rights are in good standing. Augmentation is considered a municipal purpose and there is no change in use designation needed.
- This project can be operated adaptively by varying the augmentation rate seasonally or annually based on factors such as precipitation rates and low flows.
- The project provides a benefit to the stream being augmented in that the relatively cool groundwater pumped would benefit the stream during low flow time conditions when flows are lowest and water temperatures are highest. The stream depletion impact due to the increased pumping would be spread out over the entire year, with much of the impacts occurring during the non-critical low flow period, depending on many factors.

Concerns Raised by Committee Members

Below is a summary of concerns heard at the September Committee meeting and clarification from the project sponsor where appropriate.

Concern 1: We are concerned about potential impacts of far field effects of groundwater (ie. augmenting one creek/subbasin but creating problems for others).

- **Clarification:** The potential impacts to streams and the extent of the impact is variable (case-by-case) depending on the depth and physical characteristics of the source aquifer, distance from the stream, and the hydraulic connectivity between the source aquifer and the streams. These projects are operating within existing water rights. Instead of augmenting streamflows, the water could be used to serve future homes/systems. This use will benefit streamflow more than will occur otherwise. The goal is to augment the streams that are most likely impacted by PE wells, are important for fish, and to provide the water when it is most needed for fish.

Concern 2: We need to protect our deep aquifers and not use groundwater to make up for impacts happening currently or in the future.

Clarification: Yes, maintaining the function and capacity of deep aquifers is needed. However, there is a greater need to protect the shallow aquifers, which provide the groundwater baseflow to the streams. See response above.

Concern 3: KPUD has not memorialized their willingness to cover O&M costs after 20 years.

Clarification: Generating a long-term sustainability plan could be part of a project grant if received by the project sponsor.

Concern 4: There may be long-term consequences to streamflow and poor public perception (“robbing Peter to pay Paul”).

Clarification: While the project does take water from the existing KPUD wells to augment the streams, KPUD could choose instead to use this water to serve homes. They are voluntarily offering part of their valid water rights towards augmentation as opposed to consumption.

Concern 5: We can’t put chlorinated water in our streams. How will this project address water quality?

Clarification: KPUD will de-chlorinate the water prior to augmentation and follow all water quality protocols.

Questions for the Committee

1. With the current level of information, does the Committee want to include the KPUD Stream Augmentation projects in the WRIA 15 watershed plan as providing an offset benefit?

If Yes:

- 1) Is there additional information that the Committee wants included in the project description?
- 2) Are there refinements to the offset benefit that the Committee wants to propose?

If No:

- 1) Does the Committee have additional questions that need to be answered before the project can be considered in the plan?
- 2) Does the Committee want to retain the project in the project inventory with the concerns and questions?
- 3) Does the Committee want to remove the project from inclusion in the watershed plan?

Chapter 6. Additional Plan Recommendations

6.1 Policy and Regulatory Recommendations

[Comment 19. Note that based on the final recommendations, we can change the title of this section to “Non-Capital Recommendations” or whatever term best encompasses the set of recommendations.]

The Streamflow Restoration law lists optional elements committees may consider including in the plan to manage water resources for the WRIA or a portion of the WRIA (RCW 90.94.030(3)(f)). The WRIA 15 Committee included “policy and regulatory recommendations” in the watershed plan to show support for programs, policies, and regulatory actions that would contribute to the goal of streamflow restoration. When similar concepts arose from multiple Watershed Restoration and Enhancement Committees, the WRIA 15 Committee coordinated with those other committees to put forward common language for inclusion in the watershed plans, when appropriate. Coordination also occurred for jurisdictions that cross multiple watersheds. All projects and actions the WRIA 15 Committee intended to count toward the required consumptive use offset or NEB are included in Chapter 5: Projects and Actions.¹

As required by the NEB Guidance, the WRIA 15 Committee prepared the plan with implementation in mind. However, as articulated in the Streamflow Restoration Policy and Interpretive Statement (POL-2094), “RCW 90.94.020 and 90.94.030 do not create an obligation on any party to ensure that plans, or projects and actions in those plans or associated with rulemaking, are implemented” (Ecology 2019a). The identification and listing of these policy and regulatory recommendations is directly from the WRIA 15 Committee members and is not endorsed or opposed by Ecology.

The WRIA 15 Committee initially identified a list of potential recommendations based on proposals brought forward by members of the committee. After iterative rounds of discussion and feedback during committee meetings, in one on one conversations, and using a survey tool, the committee narrowed the recommendations to those presented below. Unless otherwise specified, the proposed implementing entity is not obligated by this plan to implement the recommendation; however, the WRIA 15 Committee requests consideration of each recommendation by the identified implementing entity.

The WRIA 15 Committee provides the following recommendations. Please note that these are not listed in order of priority:

1. Track the number and location of permit-exempt wells

Proposed implementing entity: Department of Ecology

¹ “New regulations or amendments to existing regulations adopted after January 19, 2018, enacted to contribute to the restoration or enhancement of streamflows may count towards the required consumptive use offset and/or providing NEB.” Streamflow Restoration Policy and Interpretive Statement, POL-2094

Recommendation: Change Department of Ecology’s well tracking system in the following ways, in order to track the number and location of permit-exempt wells in use:

- Collect latitude and longitude of wells on well report forms;
- Identify permit-exempt wells on well log form; and
- Provide Well ID Tag numbers to older wells, and associate well decommissioning, replacement, or other well activities with the Well ID Tag.

Purpose: Accurate tracking of the locations and features of permit-exempt wells will support the WRIA 15 Committee’s desire to engage in monitoring and adaptive management after plan adoption.

Funding source: If Ecology does not have capacity do this work with existing staffing and resources, the committee recommends the legislature provide additional funding.

[Comment 20: Additional policy proposals will follow as agreed to by the committee.]

2. Monitoring and Research

Proposed implementing entity: Multiple agencies would likely be involved in monitoring. Ecology would coordinate the development of the strategy.

Recommendation: Develop a research and monitoring strategy for WRIA 15 that addresses the following:

- Streamflow monitoring
- Groundwater monitoring
- Precipitation and drought conditions
- Water usage and water supply data

Given the cost and effort involved in developing a comprehensive strategy, this effort may need to be phased and prioritized to address most urgent needs first.

Purpose: The WRIA 15 Committee desires comprehensive monitoring data on the overall health of the watershed, including status and trends.

Funding source: Funding is needed either through legislative appropriations, grants, pooling of resources by committee members and other stakeholders, or other means.

3. Recycled Water

Proposed implementing entity: Washington State Legislature and/or Department of Ecology

Recommendation: Enact state policies that encourage the development and use of reclaimed water. Some examples are:

- Integrate reclaimed water into water planning for non-potable use in agricultural, commercial, and residential settings.

Commented [VMSJ(1): We can shorten the bullets below if appropriate; or retain for consistency with other WRIA plans if needed.

- Alleviate risks and disincentives in the Trust Water Rights Program (TWRP) that confront water right holders who are willing to switch their water source to reclaimed water.
 - Provide financial incentives to irrigators: who transfer their water right into TWRP for the purpose of augmenting instream flows; and who accept reclaimed water as a substitute for the water that is transferred.
 - Develop flexible donation terms to encourage irrigators to use reclaimed water to augment instream flows. This could include expedited processing and flexible terms for reversion to the trust water right whenever reclaimed water is unavailable (*e.g.*, reverting to a water right in temporary situations due to treatment process issues or scheduled plant maintenance).
- Address public concerns regarding the health and safety risks of reclaimed water by supporting research and public education.
- Encourage the development of ecologically beneficial watershed restoration projects that utilize reclaimed water as the water source.
- Encourage residential and commercial developers to integrate non-potable water infrastructure into their projects for on-site rainwater harvesting or reclaimed water.
- Integrate water quality and water quantity objectives in water and wastewater planning.
- Consider decentralized or on-site water recycling such as rainwater harvesting or building- or development-scale greywater recycling as tools to reduce water usage.

Purpose: Using reclaimed water to:

- Offset water that would otherwise be diverted from rivers and streams, thus preserving natural high-quality instream flow;
- Reduce the amount of treated wastewater that is discharged into receiving water bodies; and
- Create water supply options, which makes the water supply system more resilient against drought and climate change.

Funding source: Funding is needed either through legislative appropriations, grants, pooling of resources by committee members and other stakeholders, or other means. Individual projects and construction components will have to be funded with a market-based approach.

4. Water Conservation Education

Proposed implementing entity: Ecology and counties; with support from conservation districts and non-governmental organizations.

Recommendation: Ecology should partner with counties and conservation districts to develop and implement outreach and incentives programs that encourage rural landowners with PE wells to (1) reduce their indoor and outdoor water use through water conservation best practices; and (2) comply with drought and other water use restrictions.

Purpose: Raise awareness of the impacts PE well water usage has on (1) groundwater levels and (2) the connection to streams and rivers. Supplement water offset and restoration projects.

Funding source: Funding is needed either through legislative appropriations, grants, pooling of resources by committee members and other stakeholders, or other means.

5. Water Conservation Statewide Policy

Proposed implementing entity: Ecology and/or local governments

Recommendation: Implement mandatory water conservation measures in unincorporated areas of the state during drought events. Measures would focus on limiting outdoor water use, with exemptions for growing food.

Purpose: Reduce water usage in key sub-basins, especially during drought; reduce impacts on stream flows; and increase climate change resilience.

Funding source: Funding is needed either through legislative appropriations, grants, pooling of resources by committee members and other stakeholders, or other means.

DRAFT: WRIA 15 Adaptive Management Section

The WRIA 15 Committee supports an adaptive management process for implementation of the WRIA 15 watershed plan. Adaptive Management is defined in the Final NEB Guidance as “an interactive and systematic decision-making process that aims to reduce uncertainty over time and help meet project, action, and plan performance goals by learning from the implementation and outcomes of projects and actions” (Ecology, 2019). Adaptive management will help address uncertainty and provide more reasonable assurance for plan implementation. The WRIA 15 Committee recommends the following:

1. Project, Policy, and Permit-Exempt Well Tracking

It is important to track the growth of permit-exempt wells in the watershed as well as the projects and policies that were planned to offset the impacts of these PE wells. Data on these items will allow the committee to determine whether planning assumptions were accurate and whether adaptation is needed as new information is provided.

- A. The WRIA 15 Committee recommends that the following information be tracked on an ongoing basis:
 - Building permits issued that include permit-exempt wells.
 - An ongoing list and map of new permit-exempt wells in the WRIA since the enactment of RCW 90.94.
 - Status of implementation for each project included in this plan.
 - Status of policy recommendations included in this plan.

- B. In order to track project implementation, the WRIA 15 Committee recommends tracking streamflow restoration projects and new domestic permit-exempt wells to: 1) improve the capacity to conduct implementation monitoring of streamflow restoration projects and actions; 2) develop grant funding opportunities and track associated costs; and 3) provide a template for adaptively managing emergent restoration needs. The Committee recommends piloting the Salmon Recovery Portal (<https://srp.rco.wa.gov/about>), managed by the Recreation and Conservation Office (RCO), for satisfying these needs. The implementation of project tracking through a pilot program using the Salmon Recovery Portal will be coordinated by the Washington Department of Fish & Wildlife in collaboration with the Washington Department of Ecology, and RCO. Ecology is not statutorily obligated to implement projects included in approved watershed plans developed through the RCW 90.94 process. To improve harmonization of streamflow restoration with ongoing salmon recovery efforts, local salmon recovery Lead Entity Coordinators shall be consulted prior to initial data uploads. University of Washington data stewards will be employed by WDFW to conduct data entry, quality assurance, and quality control.

[Note to committee: We’ve reached out to Tristan Weiss from DFW with the questions from our 9/3 meeting.]

Table 1 summarizes the entities responsible for carrying out the tracking and monitoring recommendation and associated funding needs.

Table 1: Implementation of Tracking and Monitoring Recommendation

Action	Entity or Entities Responsible	Funding Considerations
Track building permits issued with permit exempt wells.	Ecology (via reporting from counties and cities).	The number of building permits and associated fees are transmitted to Ecology annually. No additional funding is needed.
Maintain an ongoing list and map of new PEWs within each sub-basin.	Ecology	Updated with new permit-exempt wells provided by local governments. No additional funding is needed.
Maintain a summary of the status of implementation for each project.	WDFW using the Salmon Recovery Portal	WDFW may need additional funding to support maintaining the salmon recovery portal.
Maintain a summary of the status of each policy recommendation.	<i>[needs to be completed after policy recommendations are finalized]</i>	<i>[needs to be completed after policy recommendations are finalized]</i>

2. Reporting and Adaptation

The data collected above will be provided to committee members and other interested persons through annual reporting and a self-assessment every five years. This will provide information on whether the plan’s recommendations are being implemented and whether they are having the anticipated effects.

A. The WRIA 15 Committee recommends **annual reporting** as follows:

- By September of each year, **Ecology** will prepare an annual report that includes:
 - A list of building permits issued that are associated with new domestic permit exempt wells issued in the prior calendar year, based on the information provided to Ecology by the local jurisdictions. The list will include a map of the well locations and the email address associated with the new building permit recipients where available.
 - A brief description of the status of WRIA 15 projects/actions included in this plan (this description may be drawn from the Salmon Recovery Portal if available).
 - Any other implementation actions to date, including any changes in approach since the last report, and any challenges identified that may require a change in approach.
 - Monitoring data on the status of water resources and water quality in the basin that has been collected by Ecology over the past year or that has been provided by other jurisdictions. Partner jurisdictions are encouraged to provide relevant data to Ecology for inclusion. The monitoring data may include such things as:
 - Streamflow monitoring
 - Groundwater monitoring
 - Precipitation and drought conditions
 - Water usage and water supply data
- Ecology will share the report with committee members and other interested parties.

B. The WRIA 15 Committee recommends preparing a **self-assessment every five years** as follows:

- By September of 2026 and every five years thereafter during the planning horizon period, Ecology will compile and report:

- A cumulative list of building permits issued that are associated with new domestic permit exempt wells issued from January 19, 2018 through the most recent calendar year. The list will include a map of the well locations and the email address associated with the new building permit recipients where available.
 - A description of the status of each WRIA 15 projects/actions included in this plan (this description may be drawn from the Salmon Recovery Portal if available).
 - Any other implementation actions to date, including any changes in approach since the last report, and any challenges identified that may require a change in approach.
 - Monitoring data on the status of water resources and water quality in the basin that has been collected by Ecology over the past year or that has been provided by other jurisdictions. Partner jurisdictions are encouraged to provide relevant data to Ecology for inclusion. The monitoring data may include such things as:
 - Streamflow monitoring
 - Groundwater monitoring
 - Precipitation and drought conditions
 - Water usage and water supply data
 - Estimates of the quantity of water and instream flow benefits realized through implementation of projects and actions identified in this plan.
- C. The committee believes it is essential to have a group of engaged stakeholders to continue to collaborate on the implementation of this plan. The WRIA 15 Committee recommends that the committee continue to meet as needed.
- At a minimum, the WRIA 15 Committee will convene annually via telephone to:
 - Review and discuss the annual report.
 - Share updates on project and policy implementation.
 - Discuss or develop recommendations for revisions additions or deletions to projects or other actions to planned projects or actions.
 - Every 5 years the WRIA 15 Committee will hold a series of meetings to conduct the self-assessment, including:
 - Reviewing the data from the 5-year report from Ecology.
 - Developing recommendations to adapt planned actions to ensure NEB is met.
 - Updating data and assumptions.
 - Other items identified by committee members.
 - Additional meetings may be scheduled as needed.

Table 2 summarizes the entities responsible for carrying out this recommendation and associated funding needs.

Table 2: Implementation of Reporting and Adaptation Recommendation

Action	Entity or Entities Responsible	Funding Considerations
Annual Reports	<ul style="list-style-type: none"> ● Local jurisdictions provide building permit information to Ecology. 	<ul style="list-style-type: none"> ● Local jurisdictions are already required to provide this information to Ecology ● Ecology staff would compile reports using existing resources.

Action	Entity or Entities Responsible	Funding Considerations
	<ul style="list-style-type: none"> • WDFW provides information on project status, drawn from the Salmon Recovery Portal. • Entities with monitoring data provide this to Ecology for inclusion in reports. • Ecology compiles monitoring data from within the agency and data that is provided from other entities. • Ecology compiles information into a single report for distribution to committee and other interested persons. 	<ul style="list-style-type: none"> • WDFW may need additional funds to manage the Salmon Recovery Portal.
<p>Five-Year Self-Assessment:</p>	<ul style="list-style-type: none"> • Local jurisdictions provide building permit information to Ecology. • WDFW provides information on project status, drawn from the Salmon Recovery Portal. • Entities with monitoring data provide this to Ecology for inclusion in reports. • Ecology compiles monitoring data from within the agency and data that is provided from other entities. • Ecology prepares estimates of the quantity of water and instream flow benefits realized through implementation of projects and actions identified in this plan. • Ecology compiles information into a single report for distribution to committee and other interested persons. • WRIA 15 Committee convenes to prepare recommendations for adaptation. <ul style="list-style-type: none"> ○ Prepares recommendations on changes to planned projects or actions. 	<ul style="list-style-type: none"> • Local jurisdictions are already required to provide this information to Ecology • Ecology may need funding to complete the estimate of benefits realized. • State funding or staff support will be needed to reconvene a group to prepare recommendations. • Committee members will participate in meetings using existing resources.

3. Funding

[note this funding section is specific to funding for adaptive management; other funding requests will be included in policy chapter]

The WRIA 15 Committee believes that it is essential that the state’s investment in watershed plans would be imperiled if ongoing oversight of implementation is not formally continued, including a

process to adaptively manage the plan as new information emerges. The WRIA 15 Committee recommends that the legislature provide funding to monitor plan implementation (including annual tracking of new permit-exempt wells and project implementation by subbasin) and funding to develop a process to adaptively manage implementation if NEB is not being met as envisioned by the watershed plan.

Table 3 summarizes the entities responsible for carrying out this recommendation and associated funding needs.

Table 3: Funding Recommendation

Action	Entity or Entities Responsible	Funding Considerations
Funding of Adaptive Management	Legislature	The legislature should provide funding and authorize plan implementation to adaptively manage implementation if NEB is not being met as envisioned by the watershed plan.

WRIA 15 Discussion Guide: Consumptive Use Estimate

October 1, 2020

Purpose

The purpose of this discussion guide is to summarize the current status of consumptive use estimates and determine a path forward for the watershed plan. The chair requests a decision from the committee no later than November 5, 2020 on how to address consumptive use in the watershed plan.

Background

The current draft of the WRIA 15 watershed plan presents two methods for calculating consumptive use estimates, and a range of estimates based on the various growth projection scenarios. For additional background information on previous committee discussions on these topics, please review the [“technical progress to date”](#) memo from March 2020.

The February 6, 2020 meeting summary provides reflections by committee members on the use of the different methods for calculating consumptive use. Some members advocate for using the USGS method as they feel it is grounded in real data and that the irrigation area method is inherently inflated and not representative of likely consumptive water use in the WRIA. Other committee members advocate for using the irrigated area method because this method is consistent with what other committees are using and that it likely accounts for uncertainty in our projections, therefore benefiting the watershed.

In addition, committee members are not in agreement on whether to apply an additional safety factor to account for uncertainty, climate change, or other factors. The Squaxin Island Tribe provided a proposal for a sensitivity analysis in early 2020 to help support considerations for a safety factor (documents provided by Paul to the Committee are available on [Box here](#)). The Skokomish Tribe provided an analysis of the irrigated area method to account for not needing an additional safety factor (presentation and memo provided to the committee are available on [Box here](#)).

Table 1 shows the current WRIA 15 consumptive use estimate range for the USGS Groundwater Method using various PE well projections. The range is between **408.4-516.9 acre feet per year of consumptive use** from new PE wells by 2038.

Table 2 shows the current WRIA 15 consumptive use estimate range for the Irrigated Area Method using various PE well projections. The range is between **669.1-846.8 acre feet per year of consumptive use** from new PE wells by 2038.

Table 1: Indoor and Outdoor Consumptive Use Estimates by Subbasin: Projections for the USGS Groundwater Model Method

Subbasin	Low-Growth Projection				Medium-Growth Projection				High-Growth Projection			
	Projected PE wells	Indoor CU (AF/yr)	Outdoor CU (AF/yr)	Total CU (AF/yr) in 2038	Projected PE Wells	Indoor CU (AF/yr)	Outdoor CU (AF/yr)	Total CU (AF/yr) in 2038	Projected PE wells	Indoor CU (AF/yr)	Outdoor CU (AF/yr)	Total CU (AF/yr) in 2038
West Sound	1,142	21.1	74.8	95.9	1,336	24.7	87.6	112.2	1,403	25.9	91.9	117.9
North Hood Canal	561	10.4	36.8	47.1	656	12.1	43.0	55.1	689	12.7	45.2	57.9
South Hood Canal	1,119	20.7	73.3	94.0	1,126	20.8	73.8	94.6	1,128	20.8	73.9	94.8
Bainbridge Island	491	9.1	32.2	41.3	491	9.1	32.2	41.3	516	9.5	33.8	43.4
South Sound	1,158	21.4	75.9	97.3	1,553	28.7	101.8	130.5	1,992	36.8	130.5	167.4
Vashon-Maury Island	368	6.8	24.1	30.9	368	6.8	24.1	30.9	368	6.8	24.1	30.9
McNeil Island, Anderson Island, Ketron Island	22	0.4	1.4	1.8	38	0.7	2.5	3.2	56	1.0	3.7	4.7
Total	4,861	89.8	318.6	408.4	5,568	102.9	364.9	467.8	6152	113.7	403.2	516.9

Table 2: Indoor and Outdoor Consumptive Use Estimates by Subbasin: Projections for the Irrigated Area Method

Subbasin	Low-Growth Projection				Medium-Growth Projection				High-Growth Projection			
	Projected PE wells	Indoor CU (AF/yr)	Outdoor CU (AF/yr)	Total CU (AF/yr) in 2038	Projected PE wells	Indoor CU (AF/yr)	Outdoor CU (AF/yr)	Total CU (AF/yr) in 2038	Projected PE wells	Indoor CU (AF/yr)	Outdoor CU (AF/yr)	Total CU (AF/yr) in 2038
West Sound	1,142	19.2	138.0	157.2	1,336	22.4	161.4	183.9	1,403	23.6	169.5	193.1
North Hood Canal	561	9.4	67.8	77.2	656	11.0	79.3	90.3	689	11.6	83.3	94.8
South Hood Canal	1,119	18.8	135.2	154.0	1,126	18.9	136.1	155.0	1,128	19.0	136.3	155.3
Bainbridge Island	491	8.3	59.3	67.6	491	8.3	59.3	67.6	516	8.7	62.4	71.0
South Sound	1,158	19.5	139.9	159.4	1,553	26.1	187.7	213.8	1,992	33.5	240.7	274.2
Vashon-Maury Island	368	6.2	44.5	50.7	368	6.2	44.5	50.7	368	6.2	44.5	50.7
McNeil Island, Anderson Island, Ketron Island	22	0.4	2.7	3.0	38	0.6	4.6	5.2	56	0.9	6.8	7.7
Total	4,861	81.7	587.4	669.1	5,568	93.6	672.8	766.4	6,152	103.4	743.4	846.8

Project Offsets by Subbasin

For comparison of the offset estimates for consumptive use to the current WRIA 15 projects that are estimated to provide offset, Table 3 below is presented for context. Note that the committee is committed to finding enough offsets to meet a consumptive use estimate in each subbasin. Table 3 does not represent a final decision on the offset benefit assigned to each project currently under consideration, but is based on the current information presented in the detailed project descriptions.

Table 3. DRAFT Offsets from Projects by Subbasin – [Preliminary potential offset from identified projects](#)

Subbasin	DRAFT Project Offset Estimate (afy)*
West Sound	645
North Hood Canal	800 (portion likely to WS for reclaimed water project)
South Hood Canal	172
Bainbridge Island	120
South Sound	192
Vashon-Maury Island	(high)
McNeil Island, Anderson Island, Ketron Island	1329
TOTAL	3258

****Offset benefits for each project not yet agreed to by committee. Does not include new projects from KCD, GPC, King Co. Does include KPUD stream augmentation projects. Water rights flagged for removal by KCD are not included.***

Questions for Committee Members

1. Is the Committee ready to finalize the CU estimate (either a range or a single number) through a consensus decision? If not, what additional information do you need?
2. Is the Committee comfortable with a range or do you prefer a single number? Options for a range* include:
 - a. 408.4 to 846.8 acre feet per year (low growth scenarios/USGS method – high growth scenario/irrigated area method)
 - b. 669 to 846.8 acre feet per year (low - high growth scenarios / irrigated area method)
 - c. 467.8 to 766.4 acre feet per year (med growth scenario/USGS method – med growth scenario/irrigated area method)
 - d. Other ideas?

**note that if we select a range, we will aim to find projects that meet and exceed the high end of the range in order to meet NEB.*
3. If the Committee does not want to select a single number or range, would the Committee prefer to leave Chapter 4 as is (presenting the information on the different scenarios, but not stating an estimate)?

Next Steps

1. Committee members to decide on how to present consumptive use estimates in the watershed plan.
2. Stacy revises Chapter 4 of the watershed plan accordingly.

WRIA 15 Discussion Guide: Determining Whether to Include the NEB Evaluation (Chapter 7) in the Watershed Plan

October 1, 2020

Purpose of Discussion

The purpose of the discussion is to decide whether the WRIA 15 Committee would like to include an NEB evaluation in the WRIA 15 watershed plan, and if so, what that evaluation should include.

Background

Ecology is required to complete a review of each watershed plan to determine whether it meets NEB (Net Ecological Benefit). To meet the NEB threshold, plans must demonstrate that offsets from projects and actions exceed projected consumptive use from new permit-exempt domestic groundwater withdrawals over the planning horizon.

Our committee has the option of including a NEB evaluation within the plan. If we choose to include it, Ecology will give considerable deference to our committee to decide what NEB means for our watershed.

In the [NEB guidance](#), Ecology recommends steps for planning groups to complete the NEB evaluation¹:

- Compare consumptive water use to water offset benefits generated by projects and actions at the WRIA scale.
- Compare consumptive water use to offsets within each subbasin.
- Identify the projects and actions that go beyond the needed offset in order to achieve NEB.
- Include a clear statement that the committee finds that the combined components of the plan do or do not achieve a NEB.
- If desired, include adaptive management.

Planning groups may choose not to include a NEB evaluation. Ecology will review plans that do not include a NEB evaluation, as well as any plans that include a NEB evaluation that does not meet the standards described in the NEB guidance. However, without this information and technical foundation, Ecology will not have benefit of the knowledge, insights, and expertise of local partners and stakeholders. Consequently, Ecology will review any such plan with considerably less deference than plans that include NEB evaluations that meet the standards described in the NEB guidance.

Options for Committee Consideration

1. Include a NEB evaluation within the plan, following the steps outlined above.

Potential reasons to support this option: Ecology will review our plan with considerable deference in light of the knowledge, insights, and expertise of the local partners and stakeholders who influenced the preparation of the plan. A watershed plan that includes a NEB evaluation based on this guidance significantly contributes to the reasonable assurances that the offsets and habitat improvements described within the plan will occur.

Potential reasons to oppose this option: It may take time and effort for our committee to conduct this evaluation and to reach consensus on including a statement that the committee finds that the combined components of the plan achieve NEB.

¹ This is a summary. For details, see the Final NEB Guidance page 14.

2. Include a NEB evaluation within the plan but diverge from the steps outlined above.

Potential reasons to support this option: This allows our committee to create our own framework for an analysis without being bound to Ecology's steps.

Potential reasons to oppose this option: It may take time and effort for us to agree on a revised framework, complete the work, and reach consensus on the evaluation. Adding additional components or deviating from the steps will complicate Ecology's NEB evaluation and may result in less deference to the plan's evaluation. There are also limitations on the available technical consultant resources to support the NEB evaluation.

3. Do not include a NEB evaluation within the plan and leave it to Ecology to complete the evaluation based on all the information presented in the plan.

Potential reasons to support this option: If a committee can reach agreement on the other components of the plan but can't reach an agreement on a NEB evaluation, this is a viable option to still reach local approval of the plan. Not including the NEB evaluation will save time and effort and allow the committee to focus on other plan details such as projects and actions, policy recommendations and adaptive management.

Potential reasons to oppose this option: Without this information and technical foundation, Ecology will not have benefit of the knowledge, insights, and expertise of local partners and stakeholders. Consequently, Ecology will review the plan with less deference than plans that include NEB evaluations that meet the standards described in the guidance.

Questions for committee discussion

- Do you want to include a NEB evaluation within the WRIA 15 watershed plan (Chapter 7)?
- If so, do you agree that it should follow the steps outlined in the NEB Guidance?
 - Note that the outline for the NEB chapter was shared with the Committee in the draft compiled plan distributed August 27 as Chapter 7.

Next Steps

1. If the Committee decides to include a NEB evaluation, Stacy will work with the technical consultant team to draft Chapter 7 of the watershed plan.