

From: Amanda Cronin [amanda@washingtonwatertrust.org]
Sent: Friday, February 03, 2012 1:26 PM
To: info@psp.wa.gov
Cc: Susan Adams
Subject: Action Agenda Comments from Washington Water Trust

Hello,

Washington Water Trust would like to submit the following comments regarding the [Freshwater Flows and Groundwater Protection – A8](#) section of the Action Agenda. Please feel free to contact us for additional clarification or information.

Best regards,

Amanda Cronin

Comment #1. Water acquisition (via water right leases purchases and voluntary agreements with water right holders) is the primary tool for improving flows in unregulated rivers across Washington State. We would encourage you to list water acquisition as a key tool for flow enhancement particularly to address summer low flows. Given that most Puget Sound Basins are considered overallocated by Department of Ecology, meaning more water rights have been granted than the actual flow of the stream can support, it is imperative to list water acquisition as a tool for flow restoration. As an example, Washington Water Trust completed the first permanent purchase of environmental flow in Western Washington in 2009 on Cascade Creek on Orcas Island.

Comment #2. Addressing low flow challenges in Puget Sound watershed must consider flow issues in tributaries as well as mainstem rivers. While we understand this is meant as an overview chapter without too many details, tributary flow can be one of the biggest limiting factors in salmon recovery and must be addressed by water acquisition or other water management activities. For example in the Nooksack Basin, while the flows of the mainstem river may not be a challenge for fish, flows in key tributaries like Bertrand and Fishtrap Creeks are of great concern.

Comment #3. Dungeness River flows are listed as relatively stable in the action agenda. This metric is misleading because mainstem Dungeness flows appear stable because diversions from the river have decreased. Dungeness diversions once averaged nearly 100 cfs are now averaging around 50 cfs. There has been significant effort to decrease agricultural diversions mostly through irrigation efficiencies and saving conveyance water through piping of leaky ditches. Therefore, to state that Dungeness River flows are stable and don't need restoring is misleading, they are more stable because of major restoration efforts and significantly more restoration through efficiencies and water acquisition will be needed to reach the 105 cfs target flow for late summer. By categorizing the Dungeness as stable it gives the impression that flow restoration is not needed when in fact it is one of the major limiting factors for four ESA listed fish species. Of all rivers in Puget Sound, the Dungeness holds the most promise for actual flow restoration given that there are significant agricultural diversions that can be managed differently, this opportunity does not exist in the mainstems of any other Puget Sound Rivers.

Amanda Cronin

Project Manager

Washington Water Trust

1530 Westlake Ave N. Suite 400

Seattle, WA 98109

p 206.675.1585 x100

c 206.914.9282

f 206.749.9274

amanda@washingtonwatertrust.org

www.washingtonwatertrust.org