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Cedar River Council
 Friends of the Cedar River Watershed
 Friends of the Issaquah Salmon Hatchery
 Greater Seattle Chamber of Commerce
 Long Live the Kings
 Mid-Sound Fisheries Enhancement Group
 Mountains to Sound Greenway
 Northwest Marine Trade Association
 Sno-King Watershed Council
 Trout Unlimited
 Water Tenders

Alderwood Water and Wastewater District
 National Oceanic and Atmospheric Administration
 US Army Corps of Engineers
 Washington Departments:
 Ecology
 Fish and Wildlife
 Natural Resources
 Washington Association of Sewer and Water Districts
 King Conservation District

November 15, 2018

Salmon Recovery Funding Board
 c/o Recreation and Conservation Office
 P.O. Box 40917
 Olympia, WA 98504-0917



Dear Chair Troutt and Salmon Recovery Funding Board Members:

On behalf of the Lake Washington/Cedar/Sammamish Watershed (WRIA 8) Salmon Recovery Council—a partnership of 28 local governments and stakeholder representatives from community groups, citizens, business, and state and federal agencies working collaboratively on salmon recovery—thank you for continuing to provide a vision for recovering salmon in Washington. We appreciate your leadership and support of watershed-based habitat restoration efforts around the state.

We are writing in support of the *Meadowdale Beach and Estuary Restoration Project*, which has been identified as a “Project of Concern” by the Technical Review Panel due to its cost. This project—sponsored by Snohomish County Parks—will provide salmon habitat benefits along a segment of Puget Sound shoreline that is constrained by the BNSF railroad. Habitat enhancements are expected to benefit salmon populations from multiple watersheds, and the sponsor is establishing a model for how to work successfully with BNSF to implement a process-based restoration project. Notably, the Technical Review Panel remarked that this project maximizes the habitat restoration potential at the site.

While the Meadowdale project will be expensive to implement, the sponsor’s request from the Salmon Recovery Funding Board is modest in relationship to the full project cost. The cost is high in part because of other objectives being advanced concurrent with habitat enhancement. Additionally, working with BNSF is an expensive endeavor, and the project must maintain the continued functionality of the railroad. Considering the habitat benefits and the value of improving coordination with BNSF on these types of projects, we view Meadowdale to be a worthwhile investment in restoring our watershed’s limited nearshore habitat.

The design phase of this project was identified as a Project of Concern in 2015, also due to cost, and you elected to approve funding for the project at that time. We ask you to again support our funding recommendation for this project, which will achieve half of WRIA 8’s ten-year habitat target for pocket estuary restoration.

The attachment outlines a more detailed discussion on project costs and some considerations for evaluating cost-benefit, prepared by the WRIA 8 Project Subcommittee. Thank you for your consideration of this request. If you have any questions, please contact WRIA 8 Salmon Recovery Manager Jason Mulvihill-Kuntz at 206-477-4786 or jason.mulvihill-kuntz@kingcounty.gov.

Salmon Recovery Funding Board

November 15, 2018

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Sincerely,

John Stokes
Chair, WRIA 8 Salmon Recovery Council
Councilmember, City of Bellevue

Mark Phillips
Vice-Chair, WRIA 8 Salmon Recovery Council
Councilmember, City of Lake Forest Park

Enclosure: WRIA 8 Project Subcommittee Statement on Project Costs and Review Panel Cost-Benefit Evaluations

Cc: WRIA 8 Salmon Recovery Council members

Kaleen Cottingham, Director, Recreation and Conservation Office (RCO)

Tom Slocum, Chair, SRFB Review Panel

Tara Galuska, Salmon Section Manager, RCO

Amber Moore, Salmon Recovery Manager, Puget Sound Partnership

Suzanna Smith, PSAR Program Manager, Puget Sound Partnership

Dave Somers, Executive, Snohomish County

Tom Teigen, Director, Snohomish County Parks, Recreation, and Tourism

WRIA 8 Project Subcommittee Statement on Project Costs and Review Panel Cost-Benefit Evaluations

November 15, 2018

The WRIA 8 Project Subcommittee is an interdisciplinary team of professionals that perform the watershed-based evaluation of grant proposals submitted for funding in WRIA 8. The observations that follow are being provided to the Salmon Recovery Funding Board (SRFB) as a result of the Project of Concern (POC) designation for Snohomish County Parks' Meadowdale Beach and Estuary Restoration Project.

The comment form provided by the SRFB Technical Review Panel (Review Panel) for the Meadowdale project states *"the sponsor has maximized the habitat restoration benefit potential at the site, and the project offers a unique opportunity to provide salmon access and habitat connectivity beyond the railroad grade."* In addition to offering the best habitat outcome for salmon at this site, Meadowdale demonstrates how to effectively engage and collaborate with the BNSF railroad to design and implement a project along a heavily-trafficked rail corridor—this is a significant achievement.

Meadowdale is a multi-benefit project, meaning it will improve habitat for salmon while achieving other objectives. Multi-benefit projects are increasing in number, and this approach to project implementation is opening up restoration possibilities in locations where habitat enhancement may have previously been limited due to perceived competing interests. These projects can be expensive, but they are an efficient use of public funds in that they bring disparate project goals together in an integrated solution. Reflecting a diversity of project objectives, multi-benefit projects draw on numerous funding sources to design and implement. Our observation is that SRFB and Puget Sound Acquisition and Restoration (PSAR) funds comprise a relatively small portion of a multi-benefit project's overall funding strategy, but these funds support and enable the essential salmon habitat aspects of multi-benefit projects and provide important financial contributions.

Multi-benefit projects offer an important opportunity for advancing salmon recovery, and awarding salmon recovery grant funds to a project drives a better habitat outcome than would be attained otherwise. Local watershed technical committees and the Review Panel challenge project sponsors to maximize habitat gains. Without SRFB or PSAR contributions, those same projects are likely to have less favorable and limited habitat outcomes.

When a multi-benefit project is proposed for salmon recovery funding, the lead entity works with the sponsor to scale the salmon funding request to an amount that reflects the habitat enhancement proposed at the site. For Meadowdale specifically, the sponsor's request from the SRFB equals approximately 5% of the total construction cost. During the WRIA 8 Project Subcommittee's review of this project, we agreed it is a worthwhile investment given the complexities and the process-based nature of the project design.

Regarding the Review Panel's perspective that Meadowdale has a high cost relative to the anticipated benefits, their comments say *"the Review Panel is asked to focus on evaluating the overall costs and biological benefits of a project independent of...other societal benefits."* Given that the Review Panel

does not evaluate the full scope of project elements that are unrelated to habitat enhancement or will not influence the habitat function of the site, we respectfully submit that the Review Panel's consideration of the total project cost—including those elements that are peripheral to habitat enhancement—is outside of the scope of their review.

We agree it is important for the Review Panel to understand how proposed habitat elements fit within the context of a larger project, but we also think it more appropriate for the cost-benefit evaluation to be limited to the biological components of the project. The Manual 18 guidance on cost-benefit leaves room for interpretation, and absent clear policy direction on the scope of review as it pertains to the cost-benefit criterion, we may continue to see high cost, multi-benefit projects labeled as POCs, requiring appeals to the Board on a case-by-case basis. The Meadowdale project is an example of this—the project was identified as a POC in 2015 due to cost concerns from the Review Panel, and the project is again identified as a POC in 2018 on the same basis.

We acknowledge that the Review Panel has a very challenging job, and they do it with skill and professionalism. However, the current approach to cost-benefit analysis may ultimately discourage some project sponsors from seeking SRFB and PSAR funds and from including salmon habitat restoration design features in their projects. In turn, we recommend that the Board clarify the cost-benefit criterion in the 2019 update to Manual 18 and limit the cost-benefit evaluation to the costs being proposed for salmon recovery funding and costs directly influencing proposed biological benefits.

Thank you for your continued support for locally-driven salmon recovery in Washington and for your consideration of this particular issue and our associated request.

WRIA 8 Project Subcommittee Members (2018)

Tor Bell, Mountains to Sound Greenway Trust
Jim Bower, King County
Diane Buckshnis, Councilmember, City of Edmonds
Peter Holte, City of Redmond
Cyndy Holtz, City of Seattle
Mark Phillips, Councilmember, City of Lake Forest Park
Robert Plotnikoff, Snohomish County
Scott Stolnack, King County/WRIA 8
Elizabeth Torrey, Washington Department of Fish and Wildlife