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This draft rule contains a serious omission that I hope will be corrected in the final rule. Water-use efficiency (WUE) is given almost no attention even though it is likely to be the most cost-effective and environmentally benign way to meet the goals of 173-566 WAC. In addition, WUE requires no new or modified water rights from Ecology and is, therefore, the simplest resource to acquire.

The proposed rule has only two mentions of "efficiency" and "conservation," with no definitions and distinctions between the two terms. The draft contains explicit sections on water rights, storage, altered water management, habitat, and environmental monitoring, but no explicit section on water use efficiency.

Again, I hope the final rule recognizes the enormous benefits that efficiency improvements, especially in agricultural irrigation (because of the magnitude and timing of use) would provide here.