

To: Annie Sawabini Department of Ecology Water Resources Program

WRIA 1 Rule Making Process Comments

As a citizen of WRIA, I'd like to make the following comments.

1. Thank you for reducing withdrawal limits to 500 gallons per day. This is a sensible amount for a rural residential family. However, the amount actually used will be difficult to verify without metering.
2. The majority of Proposed Mitigation Projects (MPs) (with the exception of Conservation) are generally unproven schemes that do not provide more water for instream use but move it from one pocket to another. For any MPs included and ranked in the revised Plan, please require figures on the costs per cubic foot per acre offset each year. Also, require that monitoring data and adaptive management capacity be part of the Project to measure it's actual effectiveness.
3. Several of the projects planned to offset consumptive water use would likely have been implemented even without passage of ESSB 6091. Fish and other instream resources gain no benefits from projects that were already planned or underway.
4. Please require that sources of funding and probability of attaining that funding be included in any MP.
5. Prioritize Water Conservation Projects as the primary Mitigating Action. Conservation Programs are simple, relatively painless and the only sure way to keep water in the streams during low flow periods.
6. Please don't subsidize rural development with agriculture water projects. The SRA was written to address the impacts of new rural development using exempt wells. Any improvements in irrigation efficiencies and other agricultural water projects should provide water rights for farmers who lack sufficient legal water rights and improving stream flows.
7. Please remove the Following Projects from Consideration; Projects 2 and 26 are expensive projects with many permits and uncertainty., Projects 8, 24, and 28 won't be needed if water conservation is prioritized and implemented over the next few years.
8. Please remove the new section on exemptions. WAC 173-501-074 opens up interruptible rights for Projects 2, 8, 26, and 28. This won't be needed if water conservation is implemented.

Thank you for the opportunity to comment on these proposed Rule Changes

Jim Hansen 2418 Keesling St., Bellingham, WA jh_mk1234@msn.com