

Comment on WRIA1 Rule Amendment

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Thank you for the opportunity for public comment on the proposed WRIA1 Rule Amendment. The following are my inputs:

1. Better to use solutions that are simple, low-tech, and cheap. Extremely expensive “Rube Goldberg” methods are not sustainable over the long haul. Toward this end, please:

1a. Incentivize water conservation. The cheapest way to effectively create “new” resources is to stop tossing present resources down the drain.

1b. Incentivize metering of “exempt wells”. Without metering, the stated withdrawal limit is moot. Metering, incorporating cellular-based uplink, is cheap and commercially available.

1c. Hay and alfalfa irrigation: Incentivize ag to convert high-mounted spray irrigation to low-to-the-ground irrigation, to reduce evaporative losses.

2. Make the economics and cost-effectiveness data transparent and freely available to the public. For each undertaking of this water-management project, kindly tabulate and publish the cost-per-unit water (saved or produced). Use consistent units.

3. Kill the costly boondoggles that are being contemplated: Projects 8, 24, and 28 are costly, scientifically questionable, and unneeded if you do the conservation stuff right.

4. Avoid at all costs any cross-subsidy of rural residential sprawl under the guise of agricultural water projects. Toward this end, projects 2 and 26 should be eliminated from the final plan.

5. The creation of new interruptible rights in WAC 173-501-074 is extremely unfortunate. That section should be removed.