

# Marilyn Vogler

I am submitting comments relative to three specific items: the interpretation of "domestic," the use of annual average rather than actual daily maximum, and the need to re-evaluate uses and conditions that constrain a "permit-exempt" well.

1. "Domestic" as a term has historically applied not only to the persons living in a household, but to animals kept for "domestic" use, that is, to animals not kept for the primary purpose of commercial production.

In addition, Mason County, at least, has a provision for "cottage industries," small-scale commercial uses within a residence.

I would argue that ANY residential use (including non-commercial domestic animals and cottage industries) be covered by this statute. If a "residential" use requires more than the allotted water, that "use" should be required to have a permitted well.

2. If the State is really serious about impact on stream flow, annual averaging of consumptive use in counties like Mason, which has very dry summers and very wet winters, is counter intuitive. The example you provide (someone could use 4000 GPD during the summer to water a lawn or garden, and still meet the annual "average" of 950 GPD) demonstrates how averaging allows the most water to be withdrawn during the time it is least available for stream flow. In addition, while indoor use returns (via a septic) more water to the groundwater, outdoor use returns much less and so has an even greater negative impact. I therefore believe the 950 GPD amount should apply as a MAXIMUM daily use rather than an annual average.

3. Overall, the concept of "permit-exempt" wells, with such broad allowances that they include small industrial and commercial, needs to be reconsidered. In addition, I believe any "permit-exempt" well should require metering. Based on my own careful record-keeping over the 8 years I've lived in my current residence hooked up to a metered city water system, I would argue that no one really knows, unless it's metered, how much water they use. Without a meter, how does one know whether a "limit" is being exceeded? In effect, the "limit" is not that at all but a random number. In addition, I am concerned that only those wells associated with a building permit are considered. Should not ALL new wells be regulated and accounted for in mitigation efforts?

Given the plans for future growth, the impact development has already had on stream flow, and the obvious negative impact development has already had on salmon populations, the State needs to do much more than impose fictive limits on some new wells.