

## Comments on Draft Final Guidance for Determining Net Ecological Benefit

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My comments on Ecology's *Draft Final Guidance for Determining Net Ecological Benefits* focus on metering and water-use efficiency (WUE).

**Water Meters:** Throughout this document, Ecology emphasizes the importance of accurately determining the amount of consumptive water use that must be mitigated. The only way to do this is to meter at least a representative sample of the new homes that will use permit-exempt wells. Yet, this document nowhere – not once – mentions the possibility of using water meters to determine how much water these homes will use. Appendix A of this Ecology document presents elaborate calculations to *estimate* how much water these homes will use. As Ecology well knows, the most important element of consumptive water use, both in quantity and relevance to environmental quality, is outdoor water use. Ecology's Appendix A recommends use of the decades-old and seriously out-of-date *Washington Irrigation Guide*. Why not require, or at least encourage, use of water meters? After all, state law requires that every water utility in Washington State meter every one of its customers. Shouldn't we require the same of rural households?

**Water-Use Efficiency:** Section 3.2.3.5 covers the projects that are expected to offset/mitigate consumptive water use from new rural homes using a permit-exempt well. Part B of that section offers Examples of Projects. Remarkably, not one of these examples deals with the many opportunities to improve efficiency of water use in all sectors of society: residential, commercial, industrial, and – especially – agriculture. Given the emphasis on offsetting consumptive water use in time and place, no resource is better suited to this task than WUE. Indeed, the best option is likely to be onsite mitigation, i.e., requiring each new home to purchase and use the most efficient water using equipment, both indoors (toilets, showerheads, faucets, washing machine) and outdoors (timers, drip irrigation, soil-moisture sensors). I strongly urge Ecology to greatly expand this section to encourage a close look at and subsequent deployment of WUE programs and practices as a key mitigation mechanism.