

Spokane Riverkeeper

Global Comments on the Draft Net Ecological Benefit Document.

- Mitigating of impacts due to pumping water from permit exempt wells should be "in-kind" with no "out of kind" match available. If impacts of an in-kind – water for water- mitigation is not available, then growth should not be considered sustainable, nor in the public interest and therefore not be permitted. Under no conditions should off-sets be considered such if they are out of place and time.
- Throughout the document references to off-sets and mitigation are defined as acceptable down to the sub basin level. This is not appropriate. Off sets and/or mitigation should be in the same stream location – in place. Example Page 10, PP1 under C. Individual Project evaluation.

Comments referenced by specific document location:

1) Page 3, sec. 1.

The document disavows the term Net Ecological Benefit as a non-scientific term and therefore the guidance backs away from any technical or scientific metric in establishing impacts beyond the loss of instream flow due to pumping from permit exempt wells. This is inappropriate as the loss of trout and salmon habitat or life cycle requirements that are lost to pumping impacts beyond just water, should be systematically calculated.

2) Make In kind match and out of kind match more explicit – put both terms in the glossary; page 5-6

3) In section 3.2.4.2 there should be a bullet in that list (pg. 11) that states

- Proximity to the location of pumping impact (s).

4) B. Consumption Due to Outdoor Use Page 18: The assumption of planning groups to have the option to analyze the average outdoor water is not appropriate. The planning groups should analyze GIS data/satellite imagery rather than work on an assumption of ½ acre of outdoor water use.

5) Household Consumptive Water Use: Page 19: These numbers for consumption are from a USDA WAIG produced in 1997. We suggest that a more updated study is used and or these numbers with adjustments for climate change. We now know that our climate has changed making warm/dry seasons longer in 2021-2040 much warmer and dryer. This will produce a rate for consumptive water use that is higher and have a bearing n the projection of actual impacts.

6) Page 26 last paragraph: the second sentence declares that in most cases it will not be possible to create "water for water" offsets in every basin and that offsetting water impacts at the WRIA scale is will have to do. For the record, while we understand that this is in Chapter 90.94 of the WAC, we feel that it is inappropriate and makes actual accomplishment of Net Ecological benefit impossible.

Thank you for the opportunity to comment,

respectfully,

Jerry White, Jr.
Spokane Riverkeeper