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Comment on NEB

The definition of "New Consumptive Water Use" should be interpreted to mean that all water use is consumptive and must be mitigated.

The depth of withdrawal is typically much deeper than the depth of the drainage field, in the case of indoor water use. Outdoor water use does not return water to the point of withdrawal, either. Therefore, all indoor water and outdoor water use must, by definition, be mitigated for. It is all consumptive water use because the water is not returned to the source, or immediate water environment.

The definition:

New Consumptive Water Use: The consumptive water use portion of new permit-exempt domestic groundwater withdrawals anticipated to be initiated within the planning horizon. Water Resources Program Policy 1020 (1991) states, "Consumptive water use causes diminishment of the source at the point of appropriation," and that, "Diminishment is defined as to make smaller or less in quantity, quality, rate of flow, or availability." For the purposes described here, consumptive water use is considered water that is evaporated, transpired, consumed by humans, or otherwise removed from an immediate water environment due to the use of new permit-exempt domestic wells.⁵

Sincerely,

Jim Soriano