

## Capitol Land Trust

Thank you for this opportunity to provide input into the NEB Guidance. Representing Capitol Land Trust, whose mission is to conserve essential natural areas, I have been troubled from the beginning as I was sitting in on the first Streamflow Restoration stakeholder meetings. I believe that ECY does not place enough value on the role land acquisitions play in protecting streamflow. This is displayed by the fact that land acquisition is lumped in with the lowest priority activities: "non-water offset projects."

Clearly land acquisition is not the same as water rights acquisition, or aquifer recharge, whereby water is physically being diverted from use and kept in-stream, or pumped into an aquifer (i.e. replacing water with water.) These activities rightly should be prioritized in the NEB consideration. However, most land acquisition projects prevent future water use, by preventing residential development that would otherwise rely on exempt wells. The connection between exempt wells, aquifers and stream flows is well documented, and one could argue the whole reason this Streamflow Restoration program was established. Land acquisition, while not offsetting water use, clearly prevents water use.

I believe lumping land acquisitions with "non-water offset projects" such as culvert replacements and engineered log jams minimizes the very real value acquisition projects play in reducing future water use. These other non-water offset projects do nothing to impact water use. Thus, I would urge placing land acquisition in the "Other water offset project" category or adding a "Preventing new water use" category that has a higher priority than the Non-water offset projects. If we ignore a major cause of streamflow water shortages – the installation of permit exempt wells and the opportunity to reduce them – then the Streamflow Restoration Program will fall short of its potential.