

# Joshua Kahan

I have a comment re: the following verbiage in the NEB:

The Water Offset Projects Plans should include (1) water right acquisitions, and (2) other projects that provide flow benefits...(which) may provide stream flow benefits include(ing):

- Shallow aquifer recharge
- Floodplain restoration/levee removal
- Switching the source of withdrawal from surface to groundwater, or other beneficial source exchange
- Streamflow augmentation
- Off-channel storage

The acquisition of private undeveloped land by a public agency in unincorporated areas zoned for development (RA-5, RA-10, A-10, A-35) should be considered a water offset project. These acquisitions would prevent the a) excavation and ongoing use of exempt wells; and b) clearing of vegetation which currently supports watershed hydrological integrity.