

Annie Sawabini  
Department of Ecology  
Water Resources Program  
PO Box 47600  
Olympia, WA 98504-7600

January 17, 2020

Dear Ms. Sawabini,

Thank you for accepting public comment on the proposed draft changes to Chapter 173-501 WAC, Instream Resources Protection Program - Nooksack Water Resource Inventory Area (WRIA) 1. While this rulemaking focuses narrowly on the anticipated water use impacts of permit-exempt wells over the next 20 years, we urge Ecology to take this as an opportunity to plan for the impacts of climate change on streamflows for salmon and changing demands on water use for people and farms. With water shortages becoming more common as climate change worsens in our rapidly-growing state, it's urgent to take every chance we have to give both families and fish the water they need.

We, the undersigned, submit the following comments on the "Proposed rule changes" and "Draft Rule Supporting Document".

**1. Maintain the 500 gallon per day limit for all new permit-exempt wells and the one-twelfth acre outdoor water use limit.**

Larger water limits and outdoor water use encourage people to be inefficient with their water. We agree with Ecology's justification for choosing 500 gallons per day and a one-twelfth acre outdoor water use limit to encourage conservation, especially during the summer when flows are low and groundwater levels decline.

**2. Prioritize water conservation and efficiency for all current and future water users.**

Project 46NG in the Draft Rule Supporting Document has no information about how much water could be saved from a countywide water conservation program. Please include estimates for how much water can be saved for all current users. Water efficiency and conservation is by far the most inexpensive and efficient project that could be implemented in the watershed.

**3. Include new projects, rather than projects already in progress, to offset the impacts of new well water use and achieve net-ecological benefit.**

This rulemaking is an opportunity for Ecology to go above and beyond. The projects that are listed as already in progress were going to happen for another reason and improving streamflows may be a secondary or indirect benefit. If the purpose of the SRA is to offset future exempt well use and achieve NEB, this is an opportunity to go above and beyond.

**4. Prioritize the impacts of climate change on water use and streamflow and suggest projects that will improve watershed resilience.**

Climate change is only mentioned once in the whole Draft Supporting Rule Document. Climate change impacts are not mentioned in the offset calculation and safety factor. The safety factor should be increased to reflect anticipated increased water use during the year as a result of climate impacts. This is a chance to save the state and Ecology even harder work on water conservation that will need to be done in a climate-changed future if we don't act now.

Similar to point #3 above, Ecology should propose projects that will make the watershed more resilient in the face of climate impacts such as wetland and riparian restoration and reforestation efforts.

**5. Make sure projects are being implemented as anticipated by requiring self-reporting of project proponents every year as opposed to five years.**

To truly adaptively manage whether projects are moving forward as anticipated, there should be updates more frequent than five years. Whatcom County is responsible for submitting updates each year on how many building permits utilizing exempt wells are issued. Why shouldn't project proponents?

We thank you for your attention to this critical matter for the future of our Nooksack watershed.

Sincerely,

Lynne A 98103  
Laura Ackerman 99224  
Kathryn Alexandra 98221  
Becky Anderson 98229  
Glen Anderson 98503  
Lyle Anderson 98230  
Christine Austin 98227  
Linda Avinger 98226  
Ahwren Ayers 98248  
Dennis Bahr 98296  
Stephen Bailey 98244  
Simon Bakke 98225  
Susan Bakke 98501  
Kelly Balzer 98226  
Wesley Banks 98682  
Betty Barats 98225  
Nick Barcott 98087

Vivian Bartlett 98229  
Wendy Bartlett 98225  
Sharon Belk-Krebs 98226  
Gary Bennett 98229  
Tika Bordelon 98101  
Pam Borso 98240  
Tom Borst 98267  
Bill Bowman 98257  
Kerry Brehan 98248  
Priscilla Brotherton 98229  
Robert Brown 98466  
Naomi Bunis 98229  
Lucia Burgess 98225  
Karen Burns 98225  
Linda burns 98247  
Claudia Callahan 98225  
Mark Canright 98283

Rebecca Canright 98283  
Darcy Carlson 98225  
Joel Carlson 98516  
Guy Chan 98195  
Bailey Cheney 98225  
David Church 98229  
Kevin Clark 98229  
Judith Cohen 98112  
Annapoorne Colangelo 98236  
Amanda Colbert 98226  
Judith Culver 98248  
Jeff Daffron 98226  
Barbara Davidson 98225  
Virginia Davis 98072  
Brandie Deal 98021  
Karlee Deatherage 98284

Casey Defoer 98229  
Carolyn DeSilva 98226  
Lizbeth DeWitt 98226  
Jamie Donaldson 98225  
Ro Donelson 98248  
Andronetta Douglass 98226  
Eleanor Dowson 98012  
Eric Dudley 98229  
Patrick Dukes 98225  
Wendy Eakle 98226  
Sean Edmison 98052  
Rick Eggerth 98229  
Suneeta Eisenberg 98229  
Gabe Epperson 98225  
Lori Erbs 98220  
Bronwen Evans 98104  
Dagmar Fabian 98225  
Zacchary Fairbairn 98225  
Andrew Falabella 98225  
Rose Featherston 98247  
Karen Flood 98247  
Vincent Foster 98225  
Barbara Francis 98226  
Carrie Gaasland 98229  
Patsy Gilmore 98225  
Hal Glidden 98225  
Helen Glidden 98225  
Laura Goldberg 98223  
Jan Gordon 98232  
Bonnie Goss 98229  
Lise Grace 98225  
Margarette Grant 98230  
Jude Green 98225  
Lori Gudmundson 98227  
Randy Guthrie 98290  
Jackelyn Hackett 98229  
Martha Hagan 98225  
Tom Hahney 98226  
Janet Hamill 98245  
Judy Hammer 98221  
Krista Hammer 98005  
Martha Hammer 98248  
Christine Hansen 98228

Jim Hansen 98225  
Diana Harrison 98226  
Jo Harvey 98047  
Susan Hass 98075  
Corey Havens 98225  
Linda Hawley 98229  
Libby Hazen 98225  
Margaret Henderson 98229  
Bob Hicks 98225  
Patricia Higgins 98231  
Ruth Higgins 98230  
Eleanor Hines 98225  
Sonja Hinz 98225  
Sally Hodson 98279  
Peter Holcomb 98226  
Karen Holderman 98226  
Lois Holub 98244  
Ted Holzman 98105  
Annie Honrath 98225  
Sonia Hurt 98230  
Nicole Hurtubise 98225  
Carole Jacobson 98229  
Dena Jensen 98230  
Julie Johnson 98226  
Lorraine Johnson 98125  
Mark Johnson 98226  
Richard Johnson 98229  
Arnold Jolles 98125  
Dorothy Jordan 98264  
Deborah Kaye 98230  
Mari Kemper 98229  
Monea Kerr 98225  
David Ketter 98226  
Steve Knutzen 98221  
Jane Kroger 98229  
Barbara Lamb 98260  
Elsie Lamb 98225  
Jonathan Lane 98225  
George Lawrence 98226  
David Laws 98229  
Michael Lilliquist 98225  
Sammy Low 98292  
Bjorn Lunde 98274

Melinda Lunsford 98228  
Hunter Lydon 98229  
Colson Lynn 98229  
Sean Lynott 98226  
David MacLeod 98225  
Michael Maghakian 98226  
Charlie Maliszewski 98229  
Margo Margolis 98229  
Shannon Markley 98177  
Albert Marshall 98262  
Liz Marshall 98225  
Joanne Mayhew 98502  
Roberta McBride 98026  
Gloria McClintock 98274  
Penny McGINTY 98225  
Carolyn McGlothlin 98225  
Tina McKim 98225  
Arria Merrill 98262  
Brenda Michaels 98368  
Suzanne Mitten-Lewis 98230  
Erin Moore 98225  
Amy Mower 98266  
Shirley osterhaus 98225  
Tracy Ouellette 98232  
Lynne Oulman 98225  
Adina Parsley 98292  
Shannon Parsons 98230  
Lynne Pendleton 98225  
Jim Petkiewicz 98250  
Darrell Phare 98226  
Paul Potts 98577  
John Primrose 98225  
Myra Ramos 98262  
Marguerite Rietz 98230  
Lesley Rigg 98225  
Laura Rink 98229  
Margaret Rivard 98363  
Ryan Roberts 98229  
Sandy Robson 98230  
Barbara Rosenkotter 98245  
Paula Rotondi 98226  
Elena Rumiantseva 98115  
Lynn Russell 98229

John S 98133  
Sasha Savoian 98225  
Jonathan Scanlon 98225  
James Scarborough 98225  
David Scheer 98225  
Joan Schiendelman 98503  
Jerry Schuster 98226  
Jason Scribner 99026  
Cornelia Shearer 98092  
Warren Sheay 98225  
Warren Sheay 98225  
Diane Smith 98229  
Leslie Smith 98226  
Michael Snow 98225  
Cathy Spalding 98516  
Julia Spencer 98225  
Suzanne Steel 98230  
Jaye Stover 98233  
Diane Sullivan 98277  
Kristin Sykes-David 98229  
Jeanne Taylor 98229  
Mary Teesdale 98225  
Erik Thomas 98225  
Robin Thomas 98225  
Amber Train 98226  
Friedrich Ulrich 98226  
Emily van Alyne 99353  
Elizabeth Verbeck 98660  
Dirk Vermeeren 98226  
Ann Vetter-Hansen 98225  
Thomas Voorhees 98236  
Liisa Wale 98226  
Karla Ward 98229  
Patricia Warden 98056  
Margaret Warner 98226  
Liz Washburn 98225  
Elyette Weinstein 98501  
Rebecca Westlake 98225  
Dora Weyer 98204  
Nancy White 99216  
Joe Wiederhold 98229  
Raymond Williams 99301  
Bea Wilson 98020

Sonja Wingard 98226  
Edward Wolf 98225  
Justin Woodum 98225  
Cheryn Zimmer 98274