

# Alan Chapman

Re:Out of Basin Transfers

1. Primary concern is the speculative use of transfers of water rights to different locations and uses for monopolistic manipulation of water markets in the future in over appropriated basins. Provisions in law seem to allow this. The original intent was to ensure that the original holder could continue reasonable use of the land associated with the water right. When that right is not needed for the original intent, then it should go back into potential allocation or into instream flow which might be considered as a most senior water right. Most Instream Flows are not managed, because of the late date of right, and the value of the instreams flows should be a balance of local and state public interest.

Transfer of water rights should be publicized by the reviewing agency (DOE) through a list serve of parties to the level of their geographic or legal interest

A change in the law to allow local management of water within a WRIA under a board under binding agreement to maximize benefits of increased priority instream flows, and efficient use of irrigation. Instream flows are only a part of the habitat necessary to provide valued ecosystem benefits of fish and wildlife. Lower flows can perhaps be mitigated by improved habitat structure and function.

I hope this deals with some of the questions raised. Values are sometimes more cultural, or social than monetary.