

# Sarah Mack

Carrie, Dave, and Barbara, you have done an excellent job so far with the difficult remote format. As you think about policy recommendations, I hope you will resist the temptation to treat the repeated but vague and facile opposition to "speculation" and "private interests" as widespread agreement that something must be done to prevent private holders of existing water rights from (a) placing their own beneficially-used rights in trust, or (b) operating a water bank to provide water or mitigation credits so that other people may develop their properties, irrigate their farms, or operate businesses. I think it's a good thing to stretch existing water rights to serve more people (as long as it is done without discrimination or price-gouging -- which, as Paul Jewell persuasively outlined, can be addressed by ensuring public and/or private competition). Other meeting participants appear to oppose the entire concept of water banking and/or TWR because they would prefer to see existing water rights returned to the state and never reallocated. I think it's unnecessary to impose more regulation over trust water rights, either at the front end or the back end. Some participants apparently misunderstand Ecology's already considerable authority over changes in purpose or place of use when a TWR is removed -- so maybe more public education is needed to combat that misinformation. I also hope you will give careful consideration to Bill Clarke's suggestion to explore how Ecology's actions create scarcity, contribute to excessive water right prices, and generate the need for water banks in the first place. Thanks again for the opportunity to participate. -- Sarah