

County government staff

The instructions would be easier to follow if you used outline numbering/lettering for each section (Ex. Section 1, 1.1, 1.2, 2, 2.1, 2.2, etc)

For consistency, capitalize the "WR" in "wradjudications@ecy.wa.gov"

Add, "What is a court claim?" section to the instructions. You don't have any introduction as to what this is.

Map does not clearly show that Point Roberts is part of WRIA 1. Please add inset map to show Point Roberts. It would also help if you added highways and interstates.

Under "Which court claim form do I use?", add "Use the Small Use Court Claim Form to ask the court to certificate your use at "500 GPD or less" for future use." This is the section people will look to decide which form to use, and it needs to be clear that they will only be allowed 500 GPD for future use if they use the Small Use form.

Also clearly explain that in order to use more than the claimed amount in the future (by any future property owner) they will need to apply for a permit, and that is not guaranteed to be approved. I'm concerned that the language you use encourages home well owners to use the Small Use Claim Form (because it is easier), leading them to not consider recent or soon intended uses of the stock and industrial (for agriculture) exemptions. If you are not clear about this, it will appear as if you are tricking people out of their full exemptions.

Under "LEGAL BASIS FOR CLAIMING WATER USE- FOR SMALL USE COURT CLAIM FORM ONLY", Indent this section and next to help distinct between instructions for small use and full-length forms. It would also greatly help if you used numbering for sections.

Explain what RCW is. Will codes listed be linked in the electronic version?

Under "How do I know the legal basis of my water use? 1. In the page header...", mention "menu", since that is the label in mobile view. For example, "In the page header menu..."

Under "How do I know the legal basis of my water use?...If your water use has multiple water rights with different numbers...", what if someone has one water right and they also have a permit-exempt well. Do they need to submit one form for each? Clarify that on page 1 of the Full-length Claim Form.

Under "What if I do not have a water right document?", state that stock water is unlimited.

Under "Date of First Use on Small Use Court Claim Form... Whatcom County records...", change to:

Whatcom County Assessor records are available here: property.whatcomcounty.us. After agreeing

to the terms, search by "Property Search" or select "Map Search" in the upper right corner.

Property Search

- Search by property address, property ID, parcel number, or owner.
- Select "View Details" of the property of interest in the search results.
- Scroll down and click "Improvement/Building" to expand and view the "Year Built" column.

Map Search

- Search by property address, property ID, parcel number, or use zoom and pan to location.
- Click on the property, then select "Ownership" in the window that popped up.
- Scroll down and click "Improvement/Building" to expand and view the "Year Built" column.

Skagit County Assessor records are available here: www.skagitcounty.net/Search/Property

Property Search

- Search by property address, parcel number, owner, road, or XrefID.
- Scroll down to "Improvement Attributes Summary" which is highlighted in light blue, then look for "Year Built". If on a mobile phone, scroll down and click "Improvements" to view "Year Built".

Under "Date of First Use on the Full-Length Court Claim Form", it instructs, "If you have a well log, the log will list the date the well was drilled." What about using the assessor records again? Would this be year built?

On the Full-length form, Question 3, after "The date the first steps were taken to put the water to beneficial use" add "If the use is from a domestic well, list year home was built."

Under "WATER USE- Full Length Court Claim Form Only", capitalize "Full Length Court Claim Form Only" to match other sections.

On Full-length form, Question 9, add (current use), (highest use), and (claimed use) after each respective category name. For example, "Instantaneous quantity of water currently used for irrigation (current use)" or "Instantaneous quantity of water claimed for this purpose (claimed use)". Your instructions define current use, highest use, and claimed use, but the full-length form does not currently use those terms.

Should "current use" be defined as the highest use within the past five years? It's not clear what you mean by "last season of full use". That could be interpreted as the last year or the last summer or fall, etc.

For permit-exempt well owners who are using the full-length claim form, do they need to list an instantaneous quantity? It's confusing since they are limited by gallons per day, not by gallons per minute.

Under "Water for Stock Watering", this table gives units of measure in gallons per day (GPD). The

full-length form asks for gallons per minute or cubic feet per second and acre-feet per year. Either 1) get rid of this table or 2) change it by getting rid of GPD and add "gallons per minute", "cubic feet per second", and "acre-feet per year" as columns. Calculate GPM by dividing GPD by the number of minutes the animal is awake each day. Then calculate that over to CFS. Calculate acre-feet by multiplying GPD by 0.001120887, and also add a disclaimer that people need to multiply this value by the percentage of year that they have the stock.

Also, list turkey and other poultry per animal, not per 100, for consistency. 0.14 GPD for turkey and 0.07 GPD for other poultry, then convert to GPM, CFS, and acre-feet per year.

Don't make people do more math than necessary. Give them values in units of measure that they can use!

In the instructions, add a section "Water for domestic use" between "Water for Stock Watering" and "Water use for Municipalities". Add, "Technical assistance will be available to assist with water use estimates."

Under, "What happens after I submit this form?", answer these questions: When do property owners need to submit evidence? Is that only if Ecology asks for it during their review process before approving, modifying or denying a claim? Does Whatcom County Superior Court review the property owner's claim form and Ecology's approval/modification/denial to make their decision? Is Superior Court also making a prioritized list of water rights (including permit-exempt uses)? Can you refer people to a webpage to learn more about what happens next?