

Thurston County (Bryan Benjamin)

Ecology should have engaged directly with WRECs, Watershed planning units, and implementing governments under the Streamflow Restoration Act to collaboratively draft rules during the rulemaking process rather than just provide opportunity to comment on rules that were already written by the agency.

The \$150 fee reserved by the collecting government or permit authority is not enough to operate an implementation program. In Thurston County, the \$150 fee that we reserve only covers the cost of administering permit intake and conveyance of the \$350 portion of the fee to Ecology.

The proposed rules do not address the authority of WRECs, Watershed planning units, or implementing governments to increase the fees collected to match the expense of offsetting impacts of new permit-exempt well installations, as suggested in the Streamflow Restoration Act.

The proposed rules should be amended to explicitly codify the authority of these groups to raise these fees according to the implementing government's cost of providing an offset program. The proposed rules do not address the authority of WRECs, Watershed planning units, or implementing governments to change the well withdrawal limit according to an independent determination of water availability by local permit authorities.

The proposed rules should be amended to explicitly codify the authority of permitting agencies to adopt watershed-specific well withdrawal limits Based on an indeterminate... an independent determination of water availability And prevailing annual conditions. The proposed rules do not commit continued funding for WREC or watershed planning unit meetings to adaptively manage plans developed under the Streamflow Restoration Act.

The rules should commit continued funding for these planning bodies to ensure effective implementation and commit funding to these groups. And that's the end of our comment. Thank you.