

(Comments received via online submittal form 2/19/2008)

Bob Nixon
PO Box 178
Port Angeles, WA 98362

Water belongs to the public, and should be managed in the public interest. For many reasons, this VRA is not in the public interest. The management of the Columbia River affects all citizens of the Pacific Northwest who depend upon its flows for electricity generation, navigation, fisheries sustenance, and recreation - to name a few. This proposed CSRIA VRA appears to defer too much to a few localized special interests who stand to unjustly benefit from its terms at state taxpayer expense. Nowhere in the VRA is there a requirement that potential participants must demonstrate a legitimate NEED for additional water rights or uninterrupted water rights. Water WANTS are not the same as NEEDS. Water WANTS can include desiring to hoard water rights for speculative purposes. There is no safeguard against this in the proposed VRA.

How can "maximum net benefits" for use of the public's water be determined unless participants under this VRA first demonstrate that they lack sufficient water, and then explain how they intend to put new water to use?

And, how can the public meaningfully assess whether participants will respect and not abuse the privilege of using scarce public water resources at a cost (financial as well as environmental) that is so heavily subsidized by the taxpayers? (For a participant to pay only \$10 an acre foot for the right to use water that costs taxpayers \$1000/acre foot to purchase is a very bad bargain indeed for those taxpayers, not to mention the instream values that have already been determined to be severely degraded by over-appropriation.) If potential applicants for drought permits or new water rights already hold other water rights, these applicants, at a minimum, should undergo an assessment by a neutral third party (not the CSRIA) of whether they have adhered to good water management practices in the past; whether they have complied fully with the terms and conditions of their other water rights; and whether they have complied with the state's water metering statute by measuring and recording their historical water use. Only if an applicant passes such an initial "good water-use citizenship" screening and demonstrates lawful, responsible past use of the public's water should he/she be allowed to apply for a new water right. Please tell the public who exactly will likely participate in this VRA, whether the participants already have other water rights, for what purpose the participants desire to use more water and in what amounts, and whether the participants can demonstrate a record of or propensity for complying with the law and principles of responsible resource stewardship.