
From: Mo McBroom
Sent: Wednesday, September 30, 2009 10:23 PM
To: Stock Water Working Group Members
Subject: RE: Stock-Water Work Group Submittals

I'm sending these comments out on behalf of WEC, as I haven't had the opportunity to connect with the other environmental representatives that are taking part in this group.

WEC's environmental goals include both protection of instream flows and farmland preservation. To this end, my hope would be for this group to look at policies for managing stockwater that are more equitable among all water users, allow for more effective management of the water resource, and that do not threaten the viability of existing operations. Within that framework, I think there is a lot of potential for conversation. Although WEC takes the position that the broader policy of "permit exempt" uses should be reexamined, I know that won't come from this group. But our group could find common ground by looking at more incremental changes to the stockwater exemption that could take some of the pressure off of the system and better protect the resource.

To that end, I think there is merit in having a conversation around policies that take into account the needs of the existing industry (such as the fluctuations that Chris Cheney described), and also gets at the following issues:

- A prospective quantity limit (with protections for existing facilities);
- A prospective definition of stock watering use that allows for drinking, cleaning of animals, misting, but does not include dust control, irrigation or other uses not directly related;
- Recording and reporting of water use for existing and prospective operations; and
- Safeguards to ensure limits can be effectively put in place where there is impairment of senior water rights, including streamflows.

I need to better understand the issues surrounding Jack's suggestion that forage based operations be carved out, and so don't agree or disagree with it at this time. However, it seems that most of the items listed above wouldn't unduly impact these types of operations. I'm interested in having the conversation about a carve-out if that is not the case.

Thanks everyone,
Mo

Mo McBroom
Washington Environmental Council