

From: Peters, Douglas (CTED)

Sent: Wednesday, June 17, 2009 10:54 AM

To: Wessel, Ann (ECY)

Subject: RE: Comments on Proposed Rule for WRIA 17 Quilcene-Snow Water Resources Management Program

Dear Ann,

Thanks for the opportunity to submit comments to Ecology on the proposed instream flow rules for WRIA 17. I serve this area of Washington state in my duties to provide technical assistance to local governments planning under the growth management act. I have a few comments on the proposed rule

Conservation standard

The rule proposes a conservation standard for only new permit-exempt wells, with a 500 gallon per day (gpd) limit and an 350 gpd annual average limit, for each residence. The provisions of WAC 173-517-120 (1)(c) apply to wells serving group domestic water systems, with a maximum limit of 5000 gpd per well for the group. While I think each user on such a Class B water system should be required to measure water use individually, that is not clearly stated in the rule. If there is only a single measurement device for a well serving a Class B water system, then there are potentials for overuse, abuse, and likely civil claims between users over amounts used. There is also a distinct possibility of greater water use that anticipated in the proposed rule. I recommend that each user on a Group B water system have their own meter to measure water use.

Stock watering

WAC 173-517-190 (1)(b) addresses stock watering tanks. While the rule proposes that, for small stock watering diversions, the Department of Ecology change in water right process will not be required in WRIA 17, it does not state the need to also obtain a Hydraulic Project Approval from the Department of Fish and Wildlife. This would be a good specific addition to the rule, consistent with the purpose statement in WAC 173-517-010 (5).

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My current work schedule is Mon-Thu 7 am - 6 pm.

Our GMA website is located at: <http://www.cted.wa.gov/growth>