



Small Business Economic Impact Analysis

**Chapter 173-527 WAC
And
Chapter 173-528**

**Water Resources Program for the Lewis and
Salmon-Washougal Basins**

July 2008

08-11-030

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Introduction

The Washington State Department of Ecology (Ecology) is proposing Chapters 173-527 and 173-528 of the Washington Administrative Code (WAC), Water Resource Programs for two lower Columbia River basins, Water Resources Inventory Areas (WRIA) 27 and 28.

The objective of this Small Business Economic Impact Statement (SBEIS) is to identify and evaluate the various requirements and costs that the proposed rules might impose on businesses. In particular, the SBEIS examines whether the costs on businesses from the proposed rules impose a disproportionate impact on the state's small businesses. The Revised Code of Washington (RCW) 19.85.040 describes the specific purpose and required contents of an SBEIS.¹

Ecology is developing and issuing this Small Business Economic Impact Statement (SBEIS) as part of its rule adoption process and to meet Chapter 19.85 RCW. Ecology intends to use the information in the SBEIS to ensure that the proposed rules are consistent with legislative policy.

Rule Proposals

The key elements of the proposed rules include:

- Setting instream flow levels in the watershed to protect aquatic resources, including habitat for threatened and endangered salmonids.
- Closing most sub-basins to year-round future withdrawals.
- Defining where water remains available, including year-round access in “regional supply areas,” and seasonal interruptible water supplies from larger streams (Kalama, East Fork Lewis, Lewis, and Washougal rivers).
- Creating water reservations to provide a reliable water supply for the 20-year projected population growth in closed areas.
- Specifying conditions to accessing the reservations to benefit stream resources and better manage limited supply.

The proposed instream flows are designed to protect habitat. This makes less water available for future uses during low-flow portions of the year (May 15 through November 15). To provide a reliable, year-round supply of water for future uses, it is necessary to reserve water that would not be available even when the instream flows are not met. To do this, RCW 90.54.020(3)(a) requires that Ecology determine that the reservations would serve the Overriding Considerations of the Public Interest (OCPI).

¹ Due to size limits for filing documents with the Code Reviser, the SBEIS does not contain the appendices that further explain Ecology's analysis. Nor does it contain the raw data used in this analysis, or all of Ecology's analysis of this data. However, the rule-making file contains this information and it is available upon request.

Water uses established after the instream flow rules are junior water rights and may be interrupted when instream flows are not met. Only interruptible water rights are typically available to group domestic and municipal water suppliers to meet future demands within their service areas.

The proposed reservations give exempt uses, group domestic, and municipal systems more access to reliable water supplies, consistent with RCW 90.54.020(8) and the Growth Management Act (GMA). The reservations ensure a year-round, reliable water supply to meet demands estimated to occur through 2028. Future users from the reservations could obtain their water from either groundwater or surface water sources.

Analysis of Compliance Costs for Washington Businesses

We have assessed the impacts of the proposed rules by analyzing and comparing water right management under the proposed rules in contrast to current practices. The current framework or “baseline” includes the use of water by permit-exempt wells (RCW 90.44.050) and any administrative procedures for considering applications for both new water rights and changes to existing water rights. Implementation of Chapters 90.22, 90.54, and 90.82 RCW are also part of this legal baseline. The proposed reservations allot water for new water rights.

We provide a brief description of compliance requirements below. You can find further details of water management under existing practices and proposed rules in Appendices B and C.

Water Rights Administration Under the Rules

The proposed Chapters 173-527 and 173-528 WAC will create “instream flows.” Instream flows are water rights for in-stream resources and would be protected from impairment by “junior” water rights—those with a later priority date. This means junior water rights must stop use when stream flows do not meet the minimum levels set by the senior instream flows.

The proposed rules also reserve water for future out-of-stream uses, which will not be subject to the instream flows. The reservations were recommended by the WRIA 27 and 28 watershed planning unit, a group representing a broad range of local interests. When negotiating the size of the reservations (see Appendix B), the planning unit considered both the Office of Fiscal Management’s regional population growth projections and the projected impacts to surface water flows. The reservations are also based on overriding considerations of the public interest. Water in the reservations would provide new non-interruptible water rights for those that qualify.

The reservations allot water on a sub-basin basis. Within each sub-basin, a specific amount of surface water or groundwater would be available to certain users, including:

- City/county systems.
- Public utility districts.
- Other public water systems.
- Permit-exempt well users.

As well as creating the instream flows and reservations for new uses, the proposed rules clarify other requirements that might affect future uses. We describe the expected changes to water management below. For more detail on changes to water right administration, see the Cost Benefit Analysis.

Surface Water

The decision process for surface water rights will be similar after the proposed rules as before. Currently (baseline), Ecology grants water rights subject to flow conditions or requires mitigation during low-flow periods in the areas proposed for closure. The most significant effect of the rules relates to the creation of reservations that allocate water for new uses. Through the reservations, new surface water uses may continue even during low stream flow conditions.

There may be minimal effects to water users not qualifying for the reservation. Certain non-public and larger scale water users (agriculture and industrial users) will not be able to qualify for direct access to the reservation. The proposed reservations do not provide for non-public uses of surface water. These businesses would not be able to withdraw water when water is not available (typically May 15 through November 15). During such periods, water users wanting a new water right would need to either:

- Purchase or lease, and transfer an existing water right.
- Suspend water use during periods of low flows.
- Develop storage mechanisms.
- Develop strategies, acceptable to Ecology, to mitigate their impacts.

However, we do not expect the rules to have a large effect on those that cannot directly access the reservations. These users face similar obstacles to gaining new water rights under current practices. Absent rulemaking, all new users would need to mitigate or use stored water during periods of low flow. Under the proposed rules, many will have increased access to water through a public water system that has gained rights through the reservation. We expect that most needs from expected regional growth will be satisfied through public water systems and permit-exempt wells.

Groundwater Permits

As with surface water, Ecology will also make decisions on groundwater right applications similar to the baseline, except for uses from the proposed reservations. Applications for groundwater in hydraulic continuity with rivers and streams in WRIs 27 and 28 would be subject to flow conditions under the baseline or to the instream flows under the proposed rules.

As with surface water, there may be minimal effects to those water users not qualifying for the reservation, but Ecology does not expect such effects to change business practices. In particular, many small businesses may still be able to meet demands under the groundwater permit exemption². Groundwater users under the proposed rules are also able to avoid interruption by showing that their use is not in hydraulic continuity with closed surface water bodies.

² In the state Ground Water Code, the “ground water permit exemption” allows for certain uses of small quantities of ground water; including domestic, industrial, stockwatering, and non-commercial irrigation of less than one-half acre of land. RCW 90.44.040, *See also* Washington Attorney General Opinion (2005 Op. Atty Gen. Wash. No. 17).

Overall, the change in ground water permitting does not significantly affect businesses. However, the proposed rules reduce the administrative costs of ground water permitting. The rules close certain ground water areas, making case-by-case hydraulic connection determinations unnecessary.

Permit-Exempt Ground Water

Under the proposed rules, permit-exempt well users would gain an uninterrupted permit-exempt water use under the reservation. Permit-exempt users currently withdrawal water as authorized by local law and RCW 90.44.050. Although exempt from permitting, exempt wells remain subject to all other state water laws. Permit-exempt well use can be shut off if it impairs senior water rights. This has not yet occurred in WRIsAs 27 and 28. Nonetheless, they remain susceptible to future curtailment if withdrawals result in impairment of a senior water right.

The proposed rules reserve water for future exempt wells and are not subject to interruption to protect the created instream flows. The rules provide added assurances to small businesses that rely on year-round water from exempt wells. Small businesses that locate outside the service area of municipal water suppliers are most likely to use permit-exempt wells.

Changes or Transfers of Water Rights

Ecology will continue to process changes or transfers of existing water rights as permitted by Chapters 90.03 and 90.44 RCW. The process is the same with the proposed rules as with the baseline.

Reservation of Water

The reservations of water, the use of water under the reservation, and the conditions of use, are part of the proposed rules. The reservations will allow eligible water users the benefit of having a continuous, reliable source of water during low flow periods, with a few limits. These limits include the finite quantity of the reservations and the conditions to accessing reservation water.

The proposed rules do not require permit-exempt uses to meter and report water use to Ecology. However, local public water purveyors, the county, or a municipal government may require metering and reporting through ordinances adopted to implement the watershed plan. Ecology also has authority to require metering and reporting under RCW 90.03.360 in the future.

Impacts to Businesses in WRIA 27 and 28

Of the proposed rules' elements, the created reservations will have the greatest impact on businesses. Businesses that need water only for potable use for employees and customers will receive benefits from the reservation. Businesses that also need water for commercial or industrial manufacturing processes and landscape or commercial irrigation will see both costs and benefits.

The proposed rules will not directly affect existing water right holders. In general, the economic costs and benefits to businesses are from the business impacts from having less water in a river, but more water available for out of stream use. Under the proposed rules, the reservations can provide water for public water systems and permit-exempt uses, even during low flow periods,

for a projected 20-year period. Having the reservation makes water predictably and reliably available for more out of stream uses than under the baseline. Therefore, it is likely the proposed rules will have a positive effect on most of the affected businesses. An exception to this would be businesses that utilize water in the river. The possible impacts are described below.

Impacts to Businesses Dependant on Stream Flows

As stated above, the proposed rules create a series of reservations. Accessing the reservations will allow entities to use water for various uses during low flow periods. This will slightly reduce the amount of water in the river and could impact in-stream benefits such as ecosystem services, recreation, and so on. For businesses that provide guide services such as rafting, fishing, and bird watching; or those dependent on dilution for waste removal; there could be a very minor impact. However, discussions with local interests show that the proposed flow reductions will result in little, if any, impact.

Impacts to Existing Permitted Water Rights

Allowing access to water through the reservation could affect the value of existing permitted water rights held by some businesses. The exact effect will depend on the allowable use, volume, and point of diversion of the existing rights, the existing and desired uses, and the volumes needed.

Costs to Firms and Required Professional Services

As mentioned above, those business entities that depend on water in the river may experience costs from the proposed rules. Those businesses that would obtain water from the reservation are most likely to gain the benefits. The cost analyses required in Chapter 19.85 RCW follow:

Reporting and Recordkeeping: Permit Exempt Well Users

The proposed rules add no reporting or recordkeeping requirements for small businesses using permit-exempt wells.

Additional Professional Services

Ecology anticipates no added professional services. For water users qualifying for the reservations, the proposed rules reduce the need for small businesses to obtain consulting services. The proposed reservations make a reliable water supply available, without the expense and uncertainty of demonstrating water exists on a case-by-case basis.

Costs of Equipment, Supplies, Labor, and Increased Administrative Costs

We expect no additional equipment, supplies, labor, or administrative costs from the proposed rules.

Other Compliance Requirements

As mentioned above, firms that depend on instream activities and potentially those that hold existing permits could incur adverse impacts.

- The impacts to in-stream users would be specific to the firm, but is unlikely to be significant since few firms are dependent on instream flows.³
- Existing water right holders could be impacted if the proposed rules resulted in changes to the value of their water right. This would ultimately only affect those that want to sell or lease a right, and only for the period until the reservations are fully allocated to new uses. The exact cost is difficult to determine since it depends on many factors and very few if any transfers would happen in this fashion.

Creation of the reservation will be a net benefit for most businesses that need water. Water unavailable during low flow periods is damaging to any business that needs it for its own use or who are looking to develop residential or commercial properties.

For those that do not require water during low flow periods, an interruptible water right is an option under both the current practices and proposed rules.

In order to have water available during low flow periods under the baseline, water would have to be obtained through purchase, lease, transfers, or on-site storage. On-site storage for a low flow period can cost approximately \$0.75 per gallon for small water systems.⁴ This would be typical for a residence connected to a public water system; the proposed rules avoid this cost for those using the reservations. For other users, the cost of storage would likely preclude it as an option.

Currently, businesses needing water right permits in many areas must purchase or lease water. This can mean some cost for every low-flow season. This analysis assumes that water would be readily available for purchase or lease. If not the case, then prices would likely be very high.

Quantification of Costs and Ratios

It is the purpose of this section to evaluate whether:

- Compliance with the proposed rules will cause businesses to lose sales or revenue.
- The proposed rules will have a disproportionate impact on small businesses.

Revenue Impacts

As noted previously, the most likely significant impacts of the proposed rules would be from decreased flows in the river and the creation of the reservation.

- The reduction of flows in the river is unlikely to significantly affect any firms within the basins.
- Those firms that will now be able to access water from the reservation will experience a benefit from being able to more easily access reliable water supplies. We estimate that summer flows will not meet the proposed minimum instream flows in a majority of years. New permits issued with stream flow conditions would be interruptible under the baseline, as under the proposed rules. Storage would likely be required for all uses

³ Talks with local interests show few commercial activities in the basin depend on instream flows.

⁴ <http://www.doh.wa.gov/ehp/dw/Publications/331-134-4-30-08.pdf>

absent the rules. In that sense, the rules will represent a negative cost (net benefit) to firms.

The net benefit to firms is the value of avoiding expensive storage, or purchasing or leasing water rights, or other mitigation options to access water during periods of low flow. This will likely lower costs to some potential water users and to that extent, may increase revenues.

Existing water right holders might see some loss in the value of existing water rights and this could lower revenues. However, as mentioned above, this effect is likely to be relatively small and so we do not consider it further.

Distribution of Compliance Costs

No business is required to access water from the reservations or comply with the proposed rules.

It is possible that small businesses could have costs under the proposed rules if they pursue water rights outside the reservations and regional supply areas. Still, the cost should be similar or less to the expense now incurred, as Ecology is likely to issue only interruptible rights if sufficient mitigation is not proposed. The rules, for the most part, only clarify the conditions for granting a new water right that exist in current practice. Ecology is unable to determine this cost as it would be very small and are unsure if future permitted water rights will be processed.

Known Costs

No businesses are required to comply with the rules. Businesses that choose to qualify for the benefits of the reservations must meet the criteria for accessing the reservation.

Ecology was unable to determine any measurable costs to small businesses from the proposed rules. If there were known costs to those required to comply with the proposed rules, it may impose disproportionate costs to small businesses. However, there is clearly a very large net benefit to those who qualify for the reservations. Those who qualify for the reservations are identified in the rules and are not directly small businesses.

Conclusions

No businesses are required to access the reservations or are subject to conditions of the rules. Ecology was unable to determine any costs to small businesses from this proposed rules. Businesses of all sizes that qualify to use the reservation will experience net benefits from the rules. If there are known costs, the rules could have disproportional costs to small businesses. Ecology was unable to determine measurable costs.

Actions Taken to Reduce the Impact on Small Business

As noted above, it is unlikely that there will be significant adverse impacts on businesses (small or large) as part of this rulemaking versus the baseline. Therefore, the proposed rules take no specific measures to reduce or mitigate these rule impacts. In general, small business seeking reservation water through an exempt well may have hypothetical advantages over a larger business with needs too large to be satisfied through a permit-exempt well.

Involvement of Small Businesses in the Development of the Proposed Rules

The proposed rules have been developed as an outcome of the Lewis and Salmon-Washougal watershed planning process (WRIAs 27 and 28). This was an open process allowing for all entities to comment and take part as the project proceeded. Participants in the planning unit included small businesses and organizations representing small businesses. Public hearings will be held after the filing of the CR-102 to consider the rules and allow small businesses to provide further input.

SIC Codes of Impacted Industries

No industries are required to comply with the proposed rules unless they seek to obtain new water right permits or permit-exempt water rights in the covered area. The following list shows Standard Industrial Codes (SIC) codes for existing developable properties in the Lewis and Salmon-Washougal Basins.⁵ This serves as a representative sample of potential future businesses that may be affected.

**Table 1. Industries potentially affected by proposed rules
(North American Industry Classification System⁶)**

Storage/packing agricultural produce	Code 1151
Deciduous Tree fruits	Code 0175
Horticulture nurseries	Code 1114
Manufacturing	Code 33
Fresh fruits and Vegetables	Code 5148
Commercial greenhouses	Code 1114
Hatcheries	Code 1129
Mining, Mineral extraction	Code 21
Residential building construction	Code 2361
Nonresidential building construction	Code 2362
Produce Market	Code 445230
Construction	Code 23
Fruit Farming	Code 111339
Accommodation & Food Services	Code 722310
Golf facility	Code 713910
Stables	Code 713990
Animal Production	Code 115210

⁵ Data provided by the Clark, Cowlitz and Skamania County Assessor and by the Washington State Employment Security Department was the basis for this table.

⁶ Ecology has used NAICS codes rather than Standard Industrial Codes (SIC). It is a comparable system, used at the federal and state level, and has replaced SIC codes in common use.

Expected Jobs Created or Lost

Ecology expects the proposed reservations to serve 16,490 households over the 20 year period. If water from the reservations is fully utilized annual labor income of approximately 660 million can be realized. This could create 12,010 new supporting jobs in the Lewis and Salmon-Washougal watershed basins.

Office of Financial Management's NAICS based input/output model⁷ provides estimates of interdependence among industrial sectors in the state. Each sector not only produces and sells goods or services, but also purchases goods or services for use within its production process. Ecology expects jobs created through the proposed rules in these areas:

	Employment
Crop production	165
Animal production	62
Forestry and fishing	17
Logging	6
Mining	12
Electric utilities	56
Gas utilities	9
Other utilities	22
Construction	198
Food manufacturing	136
Textiles and apparel	23
Wood product manufacturing	17
Paper manufacturing	15
Printing	57
Petroleum and products	6
Chemical manufacturing	3
Nonmetallic mineral products manufacturing	15
Primary metals	1
Fabricated metals	13
Machinery manufacturing	5
Computer and electronic product	10
Electrical equipment	1
Aircraft and parts	0
Ship and boat building	4
Other transportation equipment	2
Furniture	22
Other manufacturing	32
Wholesale trade	271
Retail trade	2,666
Transportation and warehousing	255

Information	223
Finance and insurance	509
Real estate	552
Professional services and management	1,390
Educational services	236
Health services	2,348
Arts, recreation, and accommodation	390
Food services and drinking places	1,240
Other services	1,019
Total Employment	12,010

⁷ <http://www.ofm.wa.gov/economy/io/default.asp>

Appendix A. References

1. Lower Columbia Fish Recovery Board, Salmon-Washougal & Lewis Watershed Management Plan (WRIAS 27-28), July, 2006
http://www.lcfrb.gen.wa.us/pdf/WRIA%2027_28%20Watershed%20Management%20Plan.pdf
2. Huppert, Daniel, Gareth Green, William Beyers, Andrew Subkoviak and Andrew Wenzl, Economics of Columbia River Initiative, 2004
3. RS Means, Building Construction Cost Data, 55th Annual Edition, 1997

Appendix B – Proposed Rules (Chapter 173-527 & 173-528 WAC)

The complete rule language for establishing instream flows can be found in proposed Chapter 173-527 and 173-528 WAC. The following provides a brief description of the rule and further discussion of those specific rule provisions that may impact instream flows or out-of-stream uses of water.

WRIA 27 & 28 Rule Matrix – Net Changes from New Rules to Ecology’s Existing Regulatory Practices

Rule Section	Summary of Section	Net Effect Requiring Analysis
WAC 173-527(28)-010	Authority & Purpose	<i>N/A</i> - Provisions reflect current law.
WAC 173-527(28)-020	Definitions	<i>N/A</i> - Definitions are consistent with agency usage and practice.
WAC 173-527(28)-030	Map	<i>N/A</i>
WAC 173-527(28)-040	Compliance and Enforcement	<i>N/A</i> – Consistent with statutory requirements for compliance and enforcement.
WAC 173-527(28)-050	Establish stream management units for 34 stream management points	<i>N/A</i> - <i>See</i> analysis for Section 060 below.

Rule Section	Summary of Section	Net Effect Requiring Analysis
WAC 173-527(28)-060	Establishes monthly instream flow values at 34 control points in the basin (management units described in section 050)	<p><i>N/A</i> Rule codifies current permitting practice and statutory obligations.</p> <p>Under the Water Resources Act of 1971, Ecology currently has a legal obligation to maintain water quantities sufficient for preservation of the natural environment.</p> <p>Under this obligation, Ecology, in 1995, ceased issuing any new surface water rights in areas now being proposed for closure. Ground water permits in closed areas are only issued when adequate mitigation is in place during critical low flow periods (May – November).</p>
WAC 173-527(28)-070	Section 070 closes most surface and ground water to new consumptive uses and section 080 outlines when water rights may be approved in the future.	All surface and ground waters up gradient of Columbia River water supplies are closed by rule. Rule provides exception to closure for water allocated in reservation, water for riparian restoration, and interruptible uses. <i>See</i> analysis for individual exceptions below.
WAC 173-527(28)-080		
WAC 173-527(28)-090	Establishes and defines “regional supply areas” where water is available for future ground water withdrawals	<p><i>N/A</i> – Rule codifies current permitting practice.</p> <p>Regional supply areas in rule are the same as the areas where year-round water use is currently being permitted. Water in these areas is available above instream needs, because of tidal influence from the Columbia River and local hydrology.</p>

Rule Section	Summary of Section	Net Effect Requiring Analysis
WAC 173-527(28)-100	Defines when and where future interruptible water uses may occur	N/A - Closure with the exception for interruptible uses is consistent with existing regulatory practices (<i>see</i> Section 060 above). The time period specified in rule for interruptibles (Nov 16 – May 14) matches the high flow period when applicants are typically not required to mitigate for their use. Conversely, the period of time when interruptibles are not available in rule (May 15 – Nov 15) matches the low flow period that requires mitigation from an applicant.
WAC 173-527(28)-110	Allocates water in reservation for specific subbasins and counties (one of the exceptions to closure). Allocations are set aside for the following categories of users:	Water allocated to supply projected growth over the next 20 years, without excessively compromising instream needs during low flow. The expected allocations after reservations are exercised are represented in two tables below (<i>see</i> Table – Allocation of Reservation).
	Specific cities/purveyors	Water allocated for year-round use, as specified in tables below (Table – Allocation of Reservation). Rule allows for year-round use for water supplies that ordinarily could only be issued on an interruptible basis. Analysis required in order to compare out-of-stream and in-stream value of allocated water.
	“Other” public water systems	
	<p>Permit-exempt wells:</p> <p>Rule requires permit-exempt wells to connect to existing municipal water supply when user can connect in timely and reasonable</p>	N/A - No analysis required, consistent with existing local requirements and Department of Health regulations.

Rule Section	Summary of Section	Net Effect Requiring Analysis
	<p>manner.</p> <p>Rule sets a reservation for permit-exempt wells, per watershed and county (see Tables below).</p>	<p><i>N/A</i> - Absent proposed rule, there would be no restrictions beyond RCW 90.44.050. Rule provides adequate water supply for permit-exempt well use for the next twenty years. No change will occur during the time-frame of this economic analysis.</p>
WAC 173-527(28)-120	Identifies priority dates of reservation and repeals WAC 173-592	<i>N/A</i>
WAC 173-527(28)-130	Directs how accounting for use under the reservation will occur	<i>See analysis for Section 110.</i>
WAC 173-527(28)-140	Describes what projects qualify as an environmental restoration project (one of the exceptions to closure)	<i>N/A</i> - Exception for environmental restoration projects is consistent with existing agency practice. Criteria used in rule are consistent with agency practice of issuing temporary permits for similar purposes.

TABLE - ALLOCATION OF RESERVATION (WRIA 27)

Subbasin Name*	Water User**	Net Streamflow Depletion***
		(cfs)
Kalama River	city of Kalama	1.92
	Other public water systems	0.19
	Permit-exempt ground water wells	0.16

Middle Lewis River and Upper Lewis River	Public water systems in Cowlitz County	0.19
	Public water systems in Clark County	0.37
	Public water systems in Skamania County	0.40
	Permit-exempt ground water wells in Cowlitz County	0.07
	Permit-exempt ground water wells in Clark County	0.12
	Permit-exempt ground water wells in Skamania County	0.40
	Commercial use in Skamania County ****	0.21

East Fork Lewis River Subbasin	Clark Public Utility, City of Battle Ground and Ridgefield	2.20
	Other public water systems in Clark County	0.19
	Permit-exempt ground water wells in Clark County	0.47

* Subbasin boundaries are shown in WAC 173-527-030, and are consistent with the boundary descriptions used in the Watershed Plan.

** In the Watershed Plan, the term "domestic wells" has the same meaning as "permit-exempt ground water wells" and the term "small community water systems" has the same meaning as "public water systems." "Public water systems" is defined in RCW 70.119.020 (8).

*** If conditions in WAC 173-527-110 (2) and (6) are satisfied, the net depletion of a closed water source, set in WAC 173-527-070, shall not exceed the quantities listed for specific users.

**** Impacts from commercial use shall be limited to stream reaches upstream of Lewis River at Forest Road 90 bridge crossing (46°1'13"N, 122°1'13"W) to headwaters, including tributaries.

TABLE - ALLOCATION OF RESERVATION (WRIA 28)

Subbasin Name*	Water User**	Net Stream Flow Depletion***
		(cfs)
Salmon Creek	Clark Public Utility, Battle Ground and Ridgefield	0.13
	Permit-exempt ground water wells	0.12
Burnt Bridge	City of Vancouver	0.02
Lacamas Creek	City of Camas	0.50****
	Clark Public Utility	0.30
	Other public water systems	0.19
	Permit-exempt ground water wells	0.17

Washougal River	City of Camas	0.50****
	Other public water systems in Clark County	0.19
	Permit-exempt ground water wells in Clark County	0.17
	Other public water systems in Skamania County	0.10
	Permit-exempt ground water wells in Skamania County	0.64
Columbia River Tributaries	Public water systems in Clark County	0.10
	Permit-exempt ground water wells in Clark County	0.12
	Public water systems in Skamania County	0.10
	Permit-exempt ground water wells in Skamania County	0.12

* Subbasin boundaries are shown in WAC 173-528-030, and are consistent with the boundary descriptions used in the watershed plan.

** In the Salmon-Washougal and Lewis Watershed Management Plan, the term "domestic wells" has the same meaning as "permit-exempt ground water wells" and the term "small community water systems" has the same meaning as "public water systems." "Public water systems" is defined in RCW 70.119.020 (8).

*** If conditions in WAC 173-528-110 (2) and (6) are satisfied, the net depletion of a closed water source, set in WAC 173-528-070, shall not exceed the quantities listed for specific users.

**** The total net stream flow depletion for the City of Camas from both Lacamas and Washougal River subbasins shall not exceed 0.50 cfs.

