

Cortney Ingle

From: Phil Millam <phil.millam@gmail.com>
Sent: Sunday, August 18, 2019 3:54 PM
To: Cortney Ingle
Subject: Comments on Comp Plan/DEIS

Please accept this comment on the DEIS and Comp Plan:

The DEIS contains a serious error or, at best, a misleading statement regarding groundwater use. On page 20, lines 643-653, the document refers to the Aspect study commissioned by the Methow Valley Watershed Council, below:

Aspect Consulting conducted a study in WRIA 48 that examined, amongst other data aerial photos and available records from Class A water systems to calculate the amount of water used by a typical household. The calculations include both indoor and outdoor use. The Aspect report includes stock watering for livestock on a non-commercial basis. The study, while it calculates total withdrawal it also calculates the amount of water that is consumptive (sic) used. The latter figure is the one of focus for this EIS. Both figures are reported.

Total average water used per household: 710 GPD (per household)

(assumes .1 acres outdoor irrigating)

Total average water consumptively used 205 GPD (per household)

(assumes .1 acres outdoor watering)

In fact, the Aspect study Summary document (May 13, 2011, pp 1-2) , it says the following:

"The estimated maximum month (sic) consumptive water use rate established in the Water Withdrawal Study is 710 gallons per day (gpd) or about 0.0011 cfs per residence served by an exempt well." (Aspect Summary May 13, 2011, pages 1-2)

This distinction is important because the county is proposing to debit the water consumptively used from the reserve in the various reaches for each single domestic dwelling, built and projected. However, any debits against the reserve should be *total* use, not consumptive use.

Water rights are established for the amount of withdrawal or diversion, not what is consumptively used. This is for a number of reasons. There is no way of knowing actual consumptive use for agricultural or domestic use. It is always an estimate. Exempt wells are limited to a TOTAL withdrawal of 5,000/day, not consumptive use. The impact of a withdrawal or diversion is immediate. The non consumptive water does return to the system but at a later time and place.

These factors are very site-specific and beyond our true capability to manage water use. This is particularly important when deciding what to debit from the 2 cfs because what should be looked at is the amount of water that can be withdrawn before other rights are affected. The rule set aside 2cfs/reach for future appropriation, not 2cfs consumptive use.



As a matter of policy in WRIA 48, the county should be debiting total use and examining the feasibility of metering all new single domestic withdrawals, and this should be reflected in the comp plan.

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