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To: Spokane County Water Resources Department

3/31/19

From: Spokane Riverkeeper

Subject: WRIA 55-Little Spokane River (LSR) – Comments on Evaluation of Future Exempt Well Demand (DEW) and Review of Existing Watershed Plan and Implementation

Dear Carl Einberger:

We would like to offer the following feedback on the WRIA 55 Watershed Management Plan and the DEW as it is being developed for the Little Spokane River (LSR) basin.

As you know, the Little Spokane River is under severe water stress and in many years does not make its instream flow requirements. Therefore both the main-stem and tributaries are extremely vulnerable to being damaged further by the over issuance of permit exempt wells. The passage of ESSB 6091 as codified by 90.94, requires the planning effort is underway in WRIA 55 to protect and enhance stream flows in the LSR basin.

We have been attending the planning meetings and have several comments on this process, the potential outcome and final product – a Watershed Management Plan that is in place and the protection LSR flows for ecological values in the LSR basin. Our comments on the plan as well as the Evaluation of Future Exempt Well Demand are as follows:

Watershed Management Plan:

- 1) The action of acquiring and retiring existing water rights so that these can be used in direct (water for Water in place and time) mitigation is a good idea and we support this.
- 2) The Watershed Management planning process is moving too quickly. More time for review of the documents and the ideas put forward in these documents is needed. Please remember this process will have a profound impact on the future of the public resources and the public needs ample time

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- to decode, understand and seek expert opinions of the content inside this process. Reviewing the models, the methods and the process for this process should not be rushed if maximum public input and understanding is desired and public values are to be protected. Please allow for large open windows of review time and project those to the public so that publically informed decisions are made.
- 3) This process should be informed by the process in other WRIAs. We suggest that you spend some time educating the committee/public as to the successes and failures of other WRIAs and their Watershed Management Plans.
 - 4) Metering of new Single Family Units (SFUs) is needed to accurately understand water consumption in real time in new SFUs. Metering of stream flow in the WRIA sub-basins is necessary to accurately gage and understand the actual impacts on stream flow in these basins over the next 20 year horizon. These should be put in place, monitored and the data used to measure impacts in actual fact between now and 2040.
 - 5) Baseline information on the actual “ecological values” needs to be collected and understood to achieve proper planning and mitigation for water use by SFUs. Without this there is no actual way to understand the “net ecological benefit” in a sub-basin nor WRIA 55. For example, are fisheries rearing, spawning or migration habitat for native trout going to be considered as an ecological value? If so how do we understand what kind of “benefit” we can actually add to these values through mitigation? The same can be asked for many aquatic species, future species (to include salmon and steelhead) and/or terrestrial species that depend on riparian habitat or perennial streams. Additionally, the concept of “Net Ecological Benefit” needs to be concretely defined and explained with expert opinions and presentations.

On Evaluation of Future Exempt Well Demand (DEW):

1. The impact of global climate change should be considered and explained inside the Watershed Management Plan and the DEW. In fact, it should be factored into the Surface and Ground Water Model of projected impacts. The University of Washington Climate Science group, inside their publication Climate Change in the Northwest Implications for Our Landscapes, Waters, and Communities¹, is projecting that the LSR basin will have moved from a

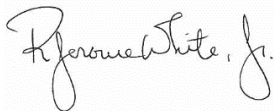
¹ <http://ceses.washington.edu/db/pdf/daltonetal678.pdf>

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mixed rain/snowpack watershed to a rain based watershed by 2080 under current carbon emissions. This will significantly impact aquifer recharge inside WRIA 55. It is essential to understand and incorporate future scenarios or the current management plan will be ineffective.

2. Additionally, we believe that it is incorrect to use the projected growth rates of SFUs (from the Office of Financial Management) for the Spokane County inside the model. **Actual growth rates (from 2001 to 2017) that reflect a higher growth rate should be used so as to produce a growth rate that most accurately and conservatively reflects the impacts on water resources in the LSR.** This is critical as this model input could bias projections that damage the future well-being of the watershed and the public. Additionally, we would like to see actual growth rates for all three counties, tracked and fed into the model at various intervals (5 year) to assess actual impacts on the watershed. This then could trigger “Adaptive Management” updates on the part of the County Governments who could act quickly to address impacts to stream flow/ecological values that were unforeseen at the time of the Watershed Plan development in 2021.

Please feel free to contact me with any questions you might have. Thank you for the opportunity to comment.



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