Policy proposal – WRIA 13 WREC

Name: Study of County Planning Streamflow Restoration Effectiveness

Entity: Squaxin Island Tribe

Type of policy idea (see list below): Special Study

Description of policy idea (a short abstract):

1. Identify the potential implementers and other key players.
   a. Consultant will conduct the study. Ecology or other entity would be lead for contracting.
2. Describe proposed actions (including current policies or codes, existing programs and their limitations, problems to be corrected, etc.).
   a. Conduct a study of how planning and permitting in the four south sound counties supports protection and enhancement of streamflow restoration, through protection and enhancement of groundwater recharge and other mechanisms.
   b. The study would evaluate how and why county programs have been effective; gaps or areas where planning has been less effective in promoting streamflow restoration; and propose ways to improve rules to promote recharge enhancement and streamflow restoration.
   c. The study report would be distributed to the study counties and relevant branches of state government to inform decision-making.
3. Identify who the action impacts (if different than primary implementer).
   a. The study would have no direct impact.
   b. The findings of the study could influence future state or local decision-making regarding state and county planning and streamflow restoration.
4. Describe benefits and challenges/obstacles.
   a. Benefits: develops information to support improvements in planning to promote streamflow restoration
   b. Challenges/obstacles: needs funding and staff resources for scope and grant development. There may be resistance to a review of county planning.

Description of purpose:

1. How would this recommendation enhance the WRIA 13 plan? Describe the desired result and its purpose in this plan (we want to be clear how this relates to offsetting impacts from PEW OR be explicit that this is a benefit to the watershed even if not directly related to PEW impacts).
   a. Better information on how county planning and permitting affects streamflows could lead to improvements that support the Plan’s goals for streamflow restoration. Such improvements would be one way to add safety factor to the goals of the Plan.

Description of concerns:

1. What, if any, concerns with this policy idea have WRIA 13 members expressed or that you anticipate?
a. This is a new proposal and has yet to be discussed. Counties may be reluctant to have their programs reviewed, or may be concerned with staff workload to provide information to the study.

2. If you have discussed this with concerned members, what was the result of those discussions?
   a. No discussions yet.

3. Are there other potential downsides or objections to the proposal that you anticipate?
   a. The study may end up “on a shelf” and not result in any improvements.

4. In what ways does your proposal address those concerns?
   a. It tries to define its content in a way that is relevant and actionable.

Cost and funding sources:

1. What elements of the proposal are likely to require funding?
   a. The study will require funding. Developing the study proposal, providing information for the study, and disseminating results will require funding for staff resources.

2. Provide a rough cost estimate (if known) and discuss potential funding sources and whether funding is one time or ongoing.
   a. Unknown at this time. Could be estimated by an experienced consultant.

3. Explain costs to other affected parties besides implementing regulators (for example: costs will increase for well drilling or new requirements on homeowners/home builders).
   a. There would be no costs to others from the Study itself.
Policy proposal – WRIA 15 WREC

Name: Water Supply Data for Comprehensive Water Planning

Entity: Squaxin Island Tribe

Type of policy idea (see list below): Monitoring and Research

Description of policy idea (a short abstract):

1. Identify the potential implementers and other key players.
   a. Ecology, possibly consultant, support from Counties and WDOH
2. Describe proposed actions (including current policies or codes, existing programs and their limitations, problems to be corrected, etc.).
   a. The following language is quoted from RCW 90.94.030:
      i. (b) At a minimum, the plan must include those actions that the committee determines to be necessary to offset potential impacts to instream flows associated with permit-exempt domestic water use.
      ii. (c) Prior to adoption of the watershed restoration and enhancement plan, the department must determine that actions identified in the plan, after accounting for new projected uses of water over the subsequent twenty years, will result in a net ecological benefit to instream resources within the water resource inventory area.
      iii. (d) The watershed restoration and enhancement plan must include an evaluation or estimation of the cost of offsetting new domestic water uses over the subsequent twenty years, including withdrawals exempt from permitting under RCW 90.44.050.
      iv. (e) The watershed restoration and enhancement plan must include estimates of the cumulative consumptive water use impacts over the subsequent twenty years, including withdrawals exempt from permitting under RCW 90.44.050.
   b. To ensure compliance with the law, and consistent with principles of sound water management, the following information needs to be developed:
      i. Past permit exempt domestic water wells and water use
      ii. All projected water use for the next 20 years
         1. Permit exempt wells
         2. Inchoate municipal water rights brought into active use
            a. Mitigated versus unmitigated
         3. New water rights
   c. The following screening level information will be developed and included in the Plan:
      i. Municipal water supply connections expected in the next 20 years, by subbasin
         1. Can be determined by difference from total growth and future PE wells
      ii. Total number of existing PE wells by subbasin
         1. Can be determined by Counties from planning and permitting information
d. Within one year of Plan approval, the following information should be developed for each subbasin:
   i. Total existing (2018 and earlier) connections in service using:
      1. unmitigated inchoate water rights
      2. mitigated inchoate water rights
   ii. Total connections expected to be put into service in the next 20 years using:
      1. unmitigated inchoate water rights
      2. mitigated inchoate water rights
      3. new water rights

3. Identify who the action impacts (if different than primary implementer).
   a. Workload and financial impacts for participants in developing the information

4. Describe benefits and challenges/obstacles.
   a. Benefits: Provides a robust information base for comprehensive water planning. Provides a context for the Plan and its goals.
   b. Challenges/obstacles: Workload and financial requirements needed.

Description of purpose:
1. How would this recommendation enhance the WRIA 15 plan? Describe the desired result and its purpose in this plan (we want to be clear how this relates to offsetting impacts from PEW OR be explicit that this is a benefit to the watershed even if not directly related to PEW impacts).
   a. Ensures that the Plan is in compliance with the law
   b. Provides vital information for comprehensive planning by understanding both legacy water use and emerging trends.
   c. Supports the overall goal of the plan to restore streamflow.

Description of concerns:
1. What, if any, concerns with this policy idea have WRIA 15 members expressed or that you anticipate?
   a. Time spend on this task takes away from other important tasks
   b. Capacity to do this work is limited
   c. Ecology takes the position that this is not required by law
2. If you have discussed this with concerned members, what was the result of those discussions?
   a. It has been discussed in Committee meetings, without result
3. Are there other potential downsides or objections to the proposal that you anticipate?
   a. None
4. In what ways does your proposal address those concerns?
   a. Split study into initial screening analysis and future more detailed analysis

Cost and funding sources:
1. What elements of the proposal are likely to require funding?
   a. Staff time for collecting and analyzing information
2. Provide a rough cost estimate (if known) and discuss potential funding sources and whether funding is one time or ongoing.
   a. One time funding, has not been determined
3. Explain costs to other affected parties besides implementing regulators (for example: costs will increase for well drilling or new requirements on homeowners/home builders).
   a. No impact on other parties
Policy proposal – WRIA 13 WREC

Name: County Policies to Promote Connections to Group A systems

Entity: Squaxin Island Tribe

Type of policy idea (see list below): Regulation

Description of policy idea (a short abstract):

1. Identify the potential implementers and other key players.
   a. Counties
2. Describe proposed actions (including current policies or codes, existing programs and their limitations, problems to be corrected, etc.).
   a. Tighten standards to increase connections to Group A systems rather than PE wells
   b. Actions could include:
      i. Require all developments or parcels to hook up to a Group A system if they are within a fixed distance of a service line, say 600 feet.
      ii. Provide other standards for “timely and reasonable” to provide consistency across all purveyors in each County and increase the likelihood of connection to Group A service instead of to a PE well
      iii. Make hookup to Group A service mandatory for all parcels under 1 acre.
3. Identify who the action impacts (if different than primary implementer).
   a. Developers and landowners requiring water service for new construction.
4. Describe benefits and challenges/obstacles.
   a. Benefits: Reduces the potential number of PE wells, which reduces groundwater consumptive use and provides a safety factor for the overall Plan goal of streamflow restoration.
   b. May increase construction costs for affected parcels. This may result in political resistance to necessary ordinance changes. Ordinances could be rolled back in the future.

Description of purpose:

1. How would this recommendation enhance the WRIA 13 plan? Describe the desired result and its purpose in this plan (we want to be clear how this relates to offsetting impacts from PEW OR be explicit that this is a benefit to the watershed even if not directly related to PEW impacts).
   a. These requirements would be consistent with the Plans’ goal of streamflow restoration.
   b. Implementation of these rules would provide a safety factor for the goal of providing offsets to exceed new PE well consumptive use.

Description of concerns:

1. What, if any, concerns with this policy idea have WRIA 13 members expressed or that you anticipate?
   a. There will likely be resistance to increased costs for new construction, even if limited.
   b. There may be political resistance to tightening development rules.
2. If you have discussed this with concerned members, what was the result of those discussions?
a. No direct discussions, but concerns have been inferred from comments at committee meetings.

3. **Are there other potential downsides or objections to the proposal that you anticipate?**
   a. Concerns noted above
   b. Lack of certainty the these recommendations will be implemented

4. **In what ways does your proposal address those concerns?**
   a. Proposed changes are targeted and narrow.
   b. Ordinance development to implement these recommendations will likely result in changes to address concerns.

**Cost and funding sources:**

1. **What elements of the proposal are likely to require funding?**
   a. Some staff time will be necessary to develop the ordinances.
   b. Grants could be obtained to compensate for increased costs (this could be a possible project for the Plan).

2. **Provide a rough cost estimate (if known) and discuss potential funding sources and whether funding is one time or ongoing.**
   a. Unknown at this time.

3. **Explain costs to other affected parties besides implementing regulators (for example: costs will increase for well drilling or new requirements on homeowners/home builders).**
   a. Hookup to a Group A system will likely increase construction costs and require homeowners to pay utility rates.
Policy proposal – WRIA 13 WREC

Name: Upgrade Well Reporting

Entity: Squaxin Island Tribe

Type of policy idea (see list below): Information process improvement

Description of policy idea (a short abstract):

1. Identify the potential implementers and other key players.
   a. Ecology
2. Describe proposed actions (including current policies or codes, existing programs and their limitations, problems to be corrected, etc.).
   a. See attached document “Proposed Improvements to the Department of Ecology’s Well Reporting Processes”
3. Identify who the action impacts (if different than primary implementer).
   a. Well drillers, all users of well database information
4. Describe benefits and challenges/obstacles.
   a. Benefits: better well location data; streamlined data collection and uploading; improved data access
   b. Challenges: requires resources for development, roll-out, and training.

Description of purpose:

1. How would this recommendation enhance the WRIA 13 plan? Describe the desired result and its purpose in this plan (we want to be clear how this relates to offsetting impacts from PEW OR be explicit that this is a benefit to the watershed even if not directly related to PEW impacts).
   a. Accurate well data is critical for all parties to make water management decisions that are protective of the environment and beneficial to communities. Improvements in the quality of well data in Washington State are essential for monitoring and management of shared water resources in the State of Washington. This supports the goals of the Plan.

Description of concerns:

1. What, if any, concerns with this policy idea have WRIA 13 members expressed or that you anticipate?
   a. None anticipated, other than perhaps the allocation of limited resources.
2. If you have discussed this with concerned members, what was the result of those discussions?
   a. Concept has been discussed, with general support.
3. Are there other potential downsides or objections to the proposal that you anticipate?
   a. None anticipated.
4. In what ways does your proposal address those concerns?
   a. Proposal stands by itself. Investment in this improvement in the short term will have long-term benefits.
Cost and funding sources:

1. *What elements of the proposal are likely to require funding?*
   a. Platform development, testing, roll-out, and user training and support

2. *Provide a rough cost estimate (if known) and discuss potential funding sources and whether funding is one time or ongoing.*
   a. Not yet known.

3. *Explain costs to other affected parties besides implementing regulators (for example: costs will increase for well drilling or new requirements on homeowners/home builders).*
   a. There may be a small cost to well drillers for technology.
Proposed Improvements to the Department of Ecology’s Well Reporting Processes
The “Upgrade Well Reporting” Proposal

Developed by the Squaxin Island Tribe in consultation with Ecology’s Well Construction and Licensing Office

Contributors: Ecology - Joe Witczak, Scott Malone, and Tara Roberts
Squaxin Island Tribe - Erica Marbet

Final Draft May 28, 2020

Purpose:
Accurate well data is critical for all parties to make water management decisions that are protective of the environment and beneficial to communities. The quality of well data in Washington State can be improved with changes to how the State collects information from drillers. These improvements are essential for monitoring and management of shared water resources in the State of Washington.

Background:
In 2018, at the request of the Squaxin Island Tribe, Ecology assigned staff to assess the accuracy of water well location reporting in Mason County. The project checked 187 water well reports (2.1% of the 8,910 water well reports from the county). Ecology uses the Public Land Survey system (PLS) to record well locations by township, range, section, quarter and quarter-quarter. Currently wells are mapped by 40-acre quarter-quarter centroids on the State Well Report Viewer. The results showed that 79% of well locations could be verified with the information on the report. Of those that could be verified, 33% had incorrectly reported PLS locations. Ecology performed a similar, statewide assessment of well location data and found a 24% error rate for all types of regulated wells.

As Tribes utilize Ecology’s well report database frequently, tribal staff would benefit by improving well location data management and processes. In discussions between Ecology, Squaxin, and Mason County, all agreed that improvements to Ecology’s well reporting processes could help reduce the error in water well location reporting.

Ecology is eager to expand their web-based well reporting options. In 2019, Ecology surveyed well drillers to determine their preferences regarding format and features. Of 133 respondents, 63% placed a high importance on a new well location mapping tool that would use recent aerial
imagery to determine a well’s PLS location and coordinates. Only 6% responded that this effort would be of low importance. These results showed drillers preferred to submit well reports from a web form in the current well report format.

We propose the following changes to Ecology’s well data processes:

1. **New well location mapping tool for drillers**
   An interactive web-based mapping tool that provides an intuitive means of determining PLS location has been implemented in Oregon recently. Ecology is interested in developing their own web tool which provides the PLS and coordinates location (latitude/longitude) for a new well automatically. The Notice of Intent web form would shell into a new GIS application utilizing recent aerial imagery, a parcel overlay, and a tool that updates the quarter-quarter and coordinates on the NOI. The well driller need only click on the interactive map to generate a well location. When a driller finishes a well report, they can utilize the same tool to refine their coordinates and PLS location.

2. **Require coordinates on well reports**
   Coordinates can perfectly describe a well location within a parcel. Adding latitude and longitude on well reports will serve to verify a well’s location on the ground accurately and easily. Ecology intends to require well coordinates on reports, though a WAC change may eventually be needed.

3. **New web-based well reporting application**
   Ecology is determining the best approach for implementing a new web-based well reporting application. According to a recent survey of drillers and their support staff, a web-form mimicking the current well report forms that uploads directly to Ecology’s database is desired. The benefits of using a web-based well reporting process are numerous:

   - Less backlog of scanning and data entry - more time for Ecology staff to vet well reports
   - Legible text, fewer written responses
   - Digitizing all well report data, not just the fields that were captured by Ecology staff during the scanning process
   - A smart form format can eliminate out-of-range entries

By capturing digitized well location data, it would be feasible in the future to automate the process of verifying well locations and water right information. Tracking well location and permit-exempt wells is a need of users who download geospatial datasets.
The Well Construction and Licensing Office at Ecology needs more capacity to vet well reports. Automation from web-based reporting would free up staff to do more vetting, because the office’s staff would not have to do as much scanning of paper documents and manual entry of data fields for each report. They need more automation, not FTEs.

*Please share this proposal with your RCW 90.94 watershed planning committees ask members to support it. This would include adding it as a proposed action in a watershed plan.*

*Please contact Mary Verner, Manager of Ecology’s Water Resources Program and Tyson Oreiro, Ecology’s Tribal Liaison to express your support for the “Upgrade Well Reporting” proposal.*

*See next two pages for figures.*
Add interactive map to automatically identify township, range, section, latitude, and longitude

Make Optional

Make Mandatory

Latitude
Longitude
Change this water well report into a web form.

- **Make Mandatory**
  - Add interactive map to automatically identify township, range, section, latitude, and longitude.
Policy proposal – WRIA 13 WREC

Name: Permit Exempt Well Withdrawal Limits

Entity: Squaxin Island Tribe

Type of policy idea: Regulation

Description of policy idea (a short abstract):

Permit Exempt Well limitations shall be established for this WRIA at the levels set in the WRIA 1 rule:

- Indoor domestic water use shall not exceed 500 gallons per day per connection, and shall not exceed a total of 3,000 gallons per day for a group domestic system; and
- Outdoor domestic water use shall be limited to an area not to exceed a total of one-twelfth of an acre, or 3,630 square feet, for each connection, and one-half acre total for all connections in a group domestic system. Outdoor use limits are in addition to indoor water use.

1. Identify the potential implementers and other key players.
   a. Ecology would be responsible for rule development and implementation.

2. Describe proposed actions (including current policies or codes, existing programs and their limitations, problems to be corrected, etc.).
   a. Rule revision would be required.

3. Identify who the action impacts (if different than primary implementer).
   a. Owners of homes with new permit exempt wells.

4. Describe benefits and challenges/obstacles.
   a. Benefits: reduces potential impact of new wells. Provides consistency with requirements for WRIA 1 and other WRIAs adopting these limits.
   b. Challenges/obstacles: Ecology must expend resources to implement. Compliance may be difficult to achieve and inconsistent.

Description of purpose:

1. How would this recommendation enhance the WRIA 13 plan? Describe the desired result and its purpose in this plan (we want to be clear how this relates to offsetting impacts from PEW or be explicit that this is a benefit to the watershed even if not directly related to PEW impacts).
   a. These limitations provide a “safety factor” by setting limits on PE well use based on good water conservation practices. This improves the net benefits of offset projects as they are completed to restore streamflows and protect senior water rights.

Description of concerns:

1. What, if any, concerns with this policy idea have WRIA 13 members expressed or that you anticipate?
   a. There may be resistance from homeowners who might have an expectation that there are no limits on their water use.
   b. Ecology will have to invest resources to implement this as a rule and requirement.

2. If you have discussed this with concerned members, what was the result of those discussions?
a. Concerns mainly are around compliance and enforcement – who is responsible and how would it occur?

3. Are there other potential downsides or objections to the proposal that you anticipate?
   a. Counties may be uncertain about their role in compliance or the political response to the limits.

4. In what ways does your proposal address those concerns?
   a. The proposal is consistent with a recently adopted rule.
   b. A separate proposal will address compliance and enforcement issues.

Cost and funding sources:

1. What elements of the proposal are likely to require funding?
   a. Ecology’s role in development and implementation of the requirement

2. Provide a rough cost estimate (if known) and discuss potential funding sources and whether funding is one time or ongoing.
   a. Ecology might be able to estimate from the WRIA 1 experience

3. Explain costs to other affected parties besides implementing regulators (for example: costs will increase for well drilling or new requirements on homeowners/home builders).
   a. Reduced water use will likely reduce costs to homeowners.
Policy proposal – WRIA 13 WREC

Name: Monitoring and Research

Entity: Squaxin Island Tribe

Type of policy idea (see list below): Information support

Description of policy idea (a short abstract):

The Plan should include a package of proposals for monitoring and research. Ideas to include:

- Support flow monitoring at all sites with ISF levels
- Improve ground water information – data, maps, and models
  - Map and quantify areas of impervious surface and critical recharge zones
  - Improve regional groundwater models
  - Map flow paths and rates for stream baseflow
  - Expand ground water monitoring
- Establish a program for habitat and NEB monitoring
- Monitor project implementation and effectiveness

The Plan should propose the development of a comprehensive monitoring and research strategy as part of Plan implementation. This strategy can refine the specific goals, elements, and priorities for monitoring and research.

1. Identify the potential implementers and other key players.
   a. Various: Ecology, Thurston County, Thurston CD, Squaxin Island Tribe, Thurston PUD
2. Describe proposed actions (including current policies or codes, existing programs and their limitations, problems to be corrected, etc.).
   a. A variety of studies and programs are proposed. Specific studies and proposals will be developed by entities willing to invest time and resources.
3. Identify who the action impacts (if different than primary implementer).
   a. The proposed actions will benefit all citizens in the WRIA by providing improved data and information for water planning.
4. Describe benefits and challenges/obstacles.
   b. Challenges/obstacles:
      i. Specific projects or programs need to be defined in detail
      ii. Funding will need to be obtained.

Description of purpose:

1. How would this recommendation enhance the WRIA 13 plan? Describe the desired result and its purpose in this plan (we want to be clear how this relates to offsetting impacts from PEW OR be explicit that this is a benefit to the watershed even if not directly related to PEW impacts).
   a. Information on water resources is always in short supply. Decisions are made with limited information, with assumptions made to address uncertainty. As the Plan is implemented, improved information will support adjustments to the Plan to better focus limited resources on the most significant problems and best solutions.
Description of concerns:

1. **What, if any, concerns with this policy idea have WR1A 13 members expressed or that you anticipate?**
   a. This proposal is general in nature. Different members may interpret it differently or have different priorities for the study or program they’d prefer to focus on.

2. **If you have discussed this with concerned members, what was the result of those discussions?**
   a. Discussions are supportive of the concept, although Committee members differ about details.

3. **Are there other potential downsides or objections to the proposal that you anticipate?**
   a. Funding is a challenge, leaving implementation uncertain
   b. The proposal is very general, and will likely occur piecemeal, if at all.

4. **In what ways does your proposal address those concerns?**
   a. The proposal for developing a strategy would help to provide a more comprehensive and coordinated approach.
   b. The proposal is intended to indicate the Committee’s desires, while leaving the specifics flexible and adaptable.

Cost and funding sources:

1. **What elements of the proposal are likely to require funding?**
   a. All of them

2. **Provide a rough cost estimate (if known) and discuss potential funding sources and whether funding is one time or ongoing.**
   a. Impossible to estimate.

3. **Explain costs to other affected parties besides implementing regulators (for example: costs will increase for well drilling or new requirements on homeowners/home builders).**
   a. Costs will depend on what is proposed and who agrees to fund it.
   b. A monitoring or research study should not generate subsequent costs.
Policy proposal – WRIA 13 WREC

Name: Funding for Plan Implementation

Entity: Squaxin Island Tribe

Type of policy idea (see list below): Fees

Description of policy idea (a short abstract):

Two strategies are proposed to fund implantation of the Plan:

• New Permit Exempt Well Fees will be increased to $1,500 per connection, as authorized by RCW 90.94.030 (5)(c). The Plan will identify the specific use of these fees, but the following distribution is suggested:
  o $450/connection: to Ecology for supporting implementation
  o $250/connection: retained by the County for administration and implementation costs
  o $400/connection: to Ecology to distribute to an organization to create capacity to support implementation of the plan. Ecology will identify the organization conducting this work and provide the funding support in accordance with laws and regulations.
  o $400/connection: to Ecology to fund education and technical assistance for conservation and drought resilience. Ecology will identify organizations conducting this work and provide the funding support in accordance with laws and regulations.

• The Plan will request that the legislature provide sustainable, stable funding for implementation of the Plan. This funding will be available statewide to address priority activities in common with all WRIAs with a Plan or Rule developed under RCW 90.94. These activities might include:
  o Ecology’s role in implementing the Plan and ensuring compliance with WRIA rules.
  o A statewide education and technical assistance program for water conservation and drought resilience.
  o Monitoring, modeling, and research to collect information collection that supports better water management.

The Plan recommends a dedicated fee rather than reliance on the general fund. An example might be an annual fee on permit exempt wells charged as part of the annual property tax assessment.

1. Identify the potential implementers and other key players.
   a. Ecology and Counties

2. Describe proposed actions (including current policies or codes, existing programs and their limitations, problems to be corrected, etc.).
   a. Ecology would need to develop and adopt a rule to implement this.
   b. Counties would play a role in managing fees

3. Identify who the action impacts (if different than primary implementer).
   a. New home buyers would absorb the fee in their purchase price.
   b. A positive impact to all citizens in the WRIA will occur from funding of implementation

4. Describe benefits and challenges/obstacles.
   a. Benefits: support implementation of the Plan and the ultimate achievement of its goals.
b. Challenges/obstacles: resistance to increased fees and homebuyer costs

Description of purpose:
1. How would this recommendation enhance the WRIA 13 plan? Describe the desired result and its purpose in this plan (we want to be clear how this relates to offsetting impacts from PEW OR be explicit that this is a benefit to the watershed even if not directly related to PEW impacts).
   a. Funding is critical to have a Plan that is actively implemented and achieves its goals.
   b. Funding from the legislature is highly uncertain, and the law provides a mechanism to fund implementation through fees on new wells.
   c. Funding needs are much larger than can be expected to be supported by local fees, so a parallel track to get statewide funding from the legislature should also be included.

Description of concerns:
1. What, if any, concerns with this policy idea have WRIA 13 members expressed or that you anticipate?
   a. Resistance from counties and building industry to fees that add to the cost of homes.
2. If you have discussed this with concerned members, what was the result of those discussions?
   a. Some willingness to accept a reasonable fee has been indicated.
3. Are there other potential downsides or objections to the proposal that you anticipate?
   a. Committee members want the use of the fees to be clearly described.
4. In what ways does your proposal address those concerns?
   a. I have proposed potential uses. As the Plan is more fully developed those uses can be better clarified and refined, or new ones included.
   b. Fee levels are also proposed that be modified as the Committee chooses.

Cost and funding sources:
1. What elements of the proposal are likely to require funding?
   a. The proposal is about funding.
2. Provide a rough cost estimate (if known) and discuss potential funding sources and whether funding is one time or ongoing.
   a. Summary of PE well fee proposal in the table below.
3. Explain costs to other affected parties besides implementing regulators (for example: costs will increase for well drilling or new requirements on homeowners/home builders).
   a. n/a
<table>
<thead>
<tr>
<th># wells</th>
<th>Projected Annual Revenue – current</th>
<th>Ecology</th>
<th>County</th>
<th>Implementing Group</th>
<th>Conservation /drought</th>
<th>Total / month</th>
<th>Total / year</th>
</tr>
</thead>
<tbody>
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<td>WRIA 13</td>
<td>137</td>
<td>$68,300</td>
<td>$5,123</td>
<td>$2,846</td>
<td>$4,553</td>
<td>$4,553</td>
<td>$17,075</td>
</tr>
</tbody>
</table>
Policy proposal – WRIA 13 WREC

Name: Durability of Implementation

Entity: Squaxin Island Tribe

Type of policy idea (see list below): Adaptive Management; Regulation

Description of policy idea (a short abstract):

The Plan will identify the mechanisms that add certainty to its implementation over its life. These could include documentation of past practices and standard procedures; and expected linkages to existing policies, regulations, and planning documents.

1. Identify the potential implementers and other key players.
   a. Ecology and Counties

2. Describe proposed actions (including current policies or codes, existing programs and their limitations, problems to be corrected, etc.).
   a. For Ecology, this could include Plan implementation; and rule development, adoption, and implementation.
   b. For Counties, this could include past practices and current practices with multi-jurisdictional plans; linkage to existing plans such as the Comprehensive Plan; and implementation through permitting rules.

3. Identify who the action impacts (if different than primary implementer).
   a. It will indirectly impact all stakeholders in the Plan since it will improve the likelihood that the Plan will be improved and implemented.

4. Describe benefits and challenges/obstacles.
   a. Benefits: documents procedures regarding how the Plan will be implemented, and increases the likelihood of Plan approval.
   b. Challenges/obstacles: These descriptions are based on past or current practices, or they are recommendations. There may be reluctance to include anything in the Plan that looks like a commitment.

Description of purpose:

1. How would this recommendation enhance the WRIA 13 plan? Describe the desired result and its purpose in this plan (we want to be clear how this relates to offsetting impacts from PEW OR be explicit that this is a benefit to the watershed even if not directly related to PEW impacts).
   a. It will improve the likelihood that the Plan will be improved and implemented.

Description of concerns:

1. What, if any, concerns with this policy idea have WRIA 13 members expressed or that you anticipate?
   a. There is reluctance to include anything in the Plan that looks like a commitment.

2. If you have discussed this with concerned members, what was the result of those discussions?
   a. The proposal is based on discussions with the staff of some counties.

3. Are there other potential downsides or objections to the proposal that you anticipate?
a. It takes time to write down and it has no binding impact.

4. In what ways does your proposal address those concerns?
   a. The proposal is based on past discussions.

Cost and funding sources:

1. What elements of the proposal are likely to require funding?
   a. None anticipated

2. Provide a rough cost estimate (if known) and discuss potential funding sources and whether funding is one time or ongoing.
   a. n/a

3. Explain costs to other affected parties besides implementing regulators (for example: costs will increase for well drilling or new requirements on homeowners/home builders).
   a. None anticipated