

**COOK Nirvana \* WRD**

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**From:** Sam Hobson <sam@hobson.org>  
**Sent:** Tuesday, February 16, 2021 7:19 PM  
**To:** COOK Nirvana \* WRD  
**Subject:** Comments for Feb 18 WRC meeting

Ms. Cook, these written comments are for the upcoming WRC meeting on February 18. Thank you.

sam

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Regarding the proposed groundwater study, there has been far too little attention paid to the many separate, distinct groundwater areas within the Walla Walla Subbasin. The memo to the WRC from Iverson and Burright states, "...groundwater levels in...the deep basalt aquifers <are> declining". This blanket statement is untrue. There are certainly some areas with declining groundwater levels, but there are others with stable--and even increasing--groundwater levels. Treating the entire Subbasin as a single, uniform system is a vast over-simplification and unfair to water users in stable areas. OWRD initially considered investigating small problem areas within the Subbasin, but--without any evidence support--decided to instead include the the entire Subbasin in the SWAMPA declaration. The groundwater study and any future OWRD regulation need to take a very focused approach to address *\*only\** those areas with documented problems.

Similarly, the February 4, 2021 memo from USGS opens with, "Groundwater levels in the Walla Walla River Basin (WWRB) have been declining since the 1940s". Again, this over-simplifies a complex water system and is untrue for many areas of the WWRB. If USGS is already assuming the *\*entire\** WWRB is in decline, it's easy to forecast their conclusions 4 years from now. This is unfair and not real science. WRC Commissioners: please require those involved with this study to take into account the many separate, distinct groundwater areas within the WWRB and not enter the study with prejudice. The outcome of this study needs to be nuanced, addressing concerns in *\*documented\** problem areas, but leaving untouched those areas not experiencing significant problems.

Please require those working on the study to free themselves of prejudiced beliefs and take into account that the Subbasin isn't one uniform system. Rather, it's many, many separate, distinct areas that need to be considered independently.

Thank you.

Sam Hobson