From: Elaine Chandler [redacted]
Sent: Saturday, July 07, 2012 6:57 PM
To: Wessel, Ann (ECY)
Cc: Jim McEntire; [redacted] Tharinger, Steve; [redacted] Dick Pilling
Subject: WIRA 18

Dear Ms. Wessel,

My husband and I were among the 300 concerned citizens in Sequim, June 28 who attended your WIRA 18 presentation that proposes weighty, and considerable limitations on water usage in our region.

We see these limitations as adversely impacting development and land values which in turn will decrease business and real estate tax bases. Your proposal does not take into account the effect on the local economy and the high cost of likely litigation because what you propose is a "taking" of land, an infringement upon our Constitutional rights that will lead to lawsuits to defend those rights.

We also are aware from the article in the Sequim Gazette, that your proposal to mitigate water rights does not meet the criteria of having a benefit that outweighs the expense and is therefore in violation of Washington statutory requirements. And it seems that water banking is not authorized by any statute. Your own economist, Tryg Hoff, argued that the costs of the rule by far outweighs any benefits. In Hoff's opinion, the rule "will probably save less than 1 CFS of water from the rivers and streams throughout the watershed (over a 20 year period)." When Mr. Hoff expressed his concerns, according to DOE emails, he was transferred to another department after first being pressured by his supervisors to ignore scientific evidence and the law.

The proposed rules are flawed legally, are illogical, and of a punitive nature. They smack of an anti-development policy on the part of the DOE. You will need to clarify for us and for our elected officials the logic, lawfulness and benefits of these rules by having a thorough, independent economic study done before proceeding any further. You tie everything in your rules to stream flow which is strictly surface runoff whereas well water comes from the aquifer; therefore we also think you should have an independent peer review of the science purported to be the basis of these rules before proceeding.

Sincerely,

Elaine and George Chandler
[redacted]