

**From:** Marguerite Glover [REDACTED]  
**Sent:** Wednesday, June 27, 2012 3:55 PM  
**To:** Wessel, Ann (ECY)  
**Subject:** Formal Comment for the Dungeness Water Management Rule

The Cost-Benefit Analysis for WRIA 18 East was done very quickly, by two new economists. The Benefits of this proposed Rule most certainly do not outweigh the Costs. We do not know if there would have been a lawsuit from the Tribe or anyone else, without the Rule. The percentage given for the "possibility of a lawsuit" was 14.1 to 27.7--less than a one-third chance.

The Cost of this Rule is estimated at \$7.7 million to \$23.1 million, over 20 years. Not taken into consideration was the devaluing of property. All real estate agents know that water is incredibly important in marketing a piece of property. Currently, anyone with an exempt well has the ability to

- \*\* Use up to 5,000 gallons per day for their own domestic use, and
- \*\* Water up to 1/2 acre of lawn or garden, and
- \*\* Provide stock water in unlimited quantities, and
- \*\* Use up to 5,000 gallons per day for commercial or industrial uses.

While all of these uses are very valuable, I don't really think the last one was given much thought, in the CBA. We are a rural area. Most of us have a garden, or tomatoes, or berries, or flowers. Many of us buy fruits or vegetables or flowers from farm stands, and farmers' markets. The ability to have greenhouses on your property, to provide produce for Sunny Farms, or restaurants, farm stands, street fairs, etc., is huge. The ability to water orchards, to sell fruit, from your own farm stand, or otherwise, is huge. The ability to water beautiful plants and flowers, and sell them, is huge. You can water a small nursery, with water from your exempt well. Without the Rule, this can be done. And, without the Rule, someone with a well, who wanted to expand to that use, could do also do it.

Also very valuable is garden/home orchard/berry watering part of the exemption. People enjoy their own produce, without pesticides. A garden is part of our rural lifestyle. And, the stockwatering portion of the exemption is also very valuable. Many of us buy local, organic beef, from farmers, or from Sunny Farms. We eat it, at local restaurants. We eat our own eggs from chickens, or buy eggs from farm stands. Some people raise rabbits or chickens or sheep or cows, for their own food. Without the ability to stock water, that choice is gone.

In the future, if this Rule passes, as proposed, real estate agents will be asked which properties have the ability to water outside. Which properties have the ability to have greenhouses. Which ones will be able to have, and water, an orchard. Those properties that do not have these grandfathered features, will most definitely go down in value. They will have to ask far less, for their property, than what they could today. Most certainly, they will ask the County Assessor for relief from their taxes. And, as their taxes are reduced, other taxes must go up. Grandfathered water properties will increase in value.

How much water could we buy, with the Cost of this Rule? A LOT. How many restoration or storage projects could we undertake? Quite a few.

The Benefits absolutely do not outweigh the Costs.

Sincerely,  
Marguerite A Glover

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