

From: Marguerite Glover [REDACTED]
Sent: Thursday, June 14, 2012 9:22 AM
To: Wessel, Ann (ECY)
Subject: A formal comment for the Dungeness Water Management Rule, about water restoration efforts

Ann Wessel, Washington State Department of Ecology

Dear Ann,

In the Final Environmental Impact Statement for the Dungeness River Agricultural Water Users Association Comprehensive Water Conservation Plan, November 2003 (the piping project), we are told that some of the Exempt wells would no longer produce a reliable yield. (Environmental Impacts 5-55). This means they would go dry--and, have to be drilled deeper. And, even "Non-Exempt (Public) Water Supply Wells" would experience a loss in yield, due to the piping. In the authors' estimation, this would not severely impact their production, but isn't this an impairment of a senior right, in the name of saving federally threatened or endangered species, in the Dungeness River? The cite below is just from one of the alternatives. But, certainly, there were wells that "went dry," or had to be drilled deeper, in the Silberhorn and Carlsborg areas. In the Silberhorn area, many people blamed this on the City of Sequim's wellfield. But, it appears, from the FEIS that much of that could actually have been from ditch piping. Why weren't people told? The Clallam Conservation District is obtaining a grant, to help the irrigators pipe even more miles of ditches. With the advent of this Water Rule, there should be parallel pipes--one, a line of perforated pipes, which would allow infiltration/aquifer recharge/stream enhancement, at the times of the year when there is more than enough flow in the River. Otherwise, these piping actions will further impact senior private and public well uses, along with small streams. In addition, small streams have, and will be, impacted greatly. For example, "The total 1997 average seasonal tailwater discharge to Matriotti was measured at 1.16 cfs." (5-23, in the FEIS) There are no tailwaters, with piping of the ditches.

A number of public water systems were looked at; and, it was determined that piping the irrigation ditches would create a decrease in well yields, for the City of Sequim wells; Port Williams Well #1 and #2, and Silberhorn Wells #2 and #3; for PUD wells, Mains Farm Property Association Wells #2 and #3 (inactive), Smithfield Drive Wells #1 and #2, Loma Vista Wells #2 and #3; and PUD #1 Clallam County Carlsborg Well; and, for the Sunland Water District Domestic Wells, #1 and #2. I'm assuming that there was no compensation for this impact on senior water users' rights, nor an ability to sell to the River or the Water

Exchange, some of the water there were about to lose, and will lose, under additional piping.

My understanding is that the "restoration" plans/process for the Dungeness River and the small streams has run, and will run, concurrently with the Rule process. Is there any public input allowed for these actions, or this that opportunity over? Certainly, reductions in water supply (and, in small stream flow, which I will have to address in a separate formal comment), are an economic impact, and are not a "benefit." Below is one of the discussions about the impact of the piping on existing water rights, from the FEIS:

Non-Exempt (Public) Water Supply Wells

Under the water level declines predicted by the Ecology 2003 model, non-exempt (public) water supply wells will lose a portion of their yield, but will still maintain production capacity yields. While this is different than for exempt wells (a percentage of which will lose their yield entirely, as discussed above), for non-exempt (public) water supply wells whose yields are larger, the implications and impacts of any of the action alternatives are significant. Silberhorn Wellfield production wells were estimated to lose a cumulative production capacity of 62 to 68 gpm. The Loma Vista Wellfield is predicted to experience a total decline in production of 196 to 214 gpm, and the Carlborg Well could experience a 57 to 72 gpm decline in capacity. The cumulative decline in well yield for the Sunland Water District (Domestic Wells #1 and #2) is predicted to be approximately 45 to 55 gpm.

(Environmental Impacts, 5-55)

Sincerely,

Marguerite A Glover



