

From: Roland Miller [REDACTED]
Sent: Friday, June 29, 2012 10:33 AM
To: Wessel, Ann (ECY)
Subject: Proposed water rule

Dear Ms. Wessel:

The following are my comments on the proposed rule, which I wish to put into the record:

I attended the hearing on the proposed water rule on June 28, and was absolutely astounded at some of the things that I heard. In a response to one of the questions, the DOE representative stated that this was about water and not land. That is ridiculous. Land is dependent upon water and without water, land is useless, which is why water was brought into the valley approximately 113 years ago.

I noted that of all the people that gave testimony (30 – 40?), only one person was in favor of the rule. That should be a wakeup call to DOE that the rule should not proceed as planned. Because of all the flaws and illegalities in the proposed rule, I believe that it is time for DOE to go back to the drawing board and come up with a rule that makes sense for the Dungeness watershed, even if that means starting all over again.

However, before wasting any more of the tax payers money, the Cost/Benefit Analysis should be re-done to include the following items

- a. The result of devalued land prices due to the rule. In doing this, appraisers and REALTORS® should be involved. They are the only ones that really know what will happen if the rule proceeds forward – not a desk jockey who has never been in the business.
- b. The loss of revenue to the County in tax money due to the devalued land and home prices, which will in turn affect the economy.
- c. The loss of money to the County in loss of sales tax revenue when small businesses dependent upon water cannot operate. This should include the loss of sales tax revenue that will result from business going elsewhere because the Dungeness watershed area is no longer conducive to development.
- d. The cost of lawsuits that will be brought by hundreds (class action) who object to the uncompensated taking of their property, which is what DOE will be doing when you cause it to devalue.
- e. The cost to the State, and therefore to the tax payers, if the aforementioned lawsuits result in the courts awarding huge sums when the suits are successful.

All of these factors, and probably others, should be included in a true Cost/Benefit Analysis, such as has already been done by one of DOE's own economists, but was discarded because it didn't agree with DOE's incorrect preconceived notions. If this is done I believe that it will show that you need to look at other options for preserving water, and there are many that would be less expensive and less harmful to individuals and the economy of this area,

Respectively submitted,



Roland Miller
Managing Broker
Coldwell Banker Town & Country

