

**From:** Richard Pinder [REDACTED]  
**Sent:** Friday, July 06, 2012 12:03 PM  
**To:** Wessel, Ann (ECY)  
**Cc:** Wessel, Ann (ECY)  
**Subject:** comment to Dungeness Water Rule for WRIA 18

Dear Ms Wessel,

Attached is our questions and opinion to the WRIA 18 water rule from the public meeting on June 28, 2012 in Sequim.

Thank you ,

Richard and Jill Pinder

[REDACTED]

July 6, 2012

- Richard and Jill Pinder

[REDACTED]  
[REDACTED]

**Mailing address:**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

- Department of Ecology Comment on the public hearing of June 28, 2012.
- IS THERE a problem in the water shed or is DOE looking for control of the water usage and rights of the Clallam County citizens and businesses?
- What has been the economic impact to the other counties in Washington State where DOE has imposed water rules?
- If there is a water right law in effect for the state of Washington, Why does the DOE feel the need to create a rule for water management in Clallam County Dungeness water shed?
- What are the currant facts and data to back up the WRIA 18 rule proposal?
- Where is the evidence of water usage at various times of the year that would impact ground water, stream and rivers?

- Is average rain fall and snow pack a consideration when analyzing the water usage of a certain area whether it is Clallam, Jefferson or any other county in the state?
- Has the DOE imposed water rules in eastern Washington where the rain fall is lower?
- How recent and accurate are the studies done on the Dungeness Water Shed?
- Has a study been done in the last five years?
- If WRIA 18 water usage is being measured by the Agricultural Water Users Association and the City of Sequim why do we need more regulation by the DOE?
- If it has been five years since a study has been done, why is a current (2012) cost analysis not being done to assess the economic impact to Clallam County?
- Should a current analysis be done by an independent research group?
- Do residential users actually use 5000 gal a day?
- What data supports the daily usages of a residential, commercial and farm irrigation water?
- What does the Attorney General's office have to do with the DOE except issue a formal opinion based on water exemption what data does the Attorney General's office base this formal opinion on?
- Who are the people who create and operate a water exchange?
- How are they regulated and monitored to prevent over pricing and unrealistic restrictions to the public?
- Why is it, that the public can not have a vote on the proposed water rule for the WRIA 18?
- Why is the WRIA 18 Dungeness Watershed Rule even being considered when the State DOE economist agrees there is no economic benefit to the proposed rule?
- What benefit would the DOE have in deceiving the citizen of Clallam County?
- How would this proposed rule affect Snowbird property owners who may only be here in the county for six months?
- If I have property with a well that is in use, yet have not built my home on the property, will I be exempt from the rule or is the building of a home considered a new use, if there is no change in the usage of the well?

In closing my opinion is the proposed WRIA 18 water rule is too incomplete, and should not be adopted until an accurate cost study has been done to better understand: What the egomaniac impact will be on residential, commercial and farms that require irrigation to sustain crops.