

From: Jerry Sinn [REDACTED]
Sent: Tuesday, July 03, 2012 5:54 PM
To: Wessel, Ann (ECY)
Subject: WRIA 18 proposal

Anne Wessel

I am a concerned citizen, a voter, a taxpayer, and a resident in WRIA 18. I have been reading the various articles, letters, statements, etc. relative to the pending ruling. I have also read the ruling (to the extent my technical capability would allow me). Based on my accumulated knowledge, I would offer the following observations and recommendation:

Issues relative to the proposed Water Resources Management Program for the Dungeness portion of the Elwha-Dungeness Water Resource Inventory Area (WRIA) 18, Chapter 173-518 WAC.

The economic assumptions are questionable. Property values will be negatively impacted, there will be small business impacts in construction and real estate industries, and internal analysis by DOE questions the economic assumptions and process. It appears that least burdensome alternative really was not considered.

At least two local government entities and many individuals have raised serious questions relative to conflicts with existing RCWs. They recommend that the law needs to be change before any decision is made to implement the proposed rule.

The standards to be applied to determine volumes, pricing, wildlife mitigation, etc. rely on data that is not available or at best incomplete. Therefore, it appears that the proposal is a set of assumptions developed to support a predetermined conclusion.

On a more general note, the majority of the local citizens do not support this proposal. It appears that those who stand to profit are driving and supporting the current proposal. A believable case has not been made to support a need for this proposal's conclusions. There is no factual evidence that we are going to have a serious shortage of water. Many of the local citizens do not believe any real assessment of other alternatives, e.g. water from other areas, were considered.

Until these issues are resolved and a third party economic analysis is completed, all efforts to pass this ruling need to stop. It is beyond the authority of DOE to override current law or not meet legal tests of the economics.

Respectfully submitted by,

Jerald R. Sinn
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