



NORTH OLYMPIC TIMBER ACTION COMMITTEE
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Department of Ecology

Bellingham Field Office

Attn: Ann Wessel

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Bellingham, WA. 98225

June 28, 2012

To Whom It May Concern;

The North Olympic Timber Action Committee has concerns regarding the Dungeness WRIA18 East Rule because of the impact this rule would have on the citizens and economy of Clallam County.. This is a complex issue! You have published mounds of data but few examples that would inform property owners of the real impacts to their property.

1. Who will be able to sell back water rights to the water mitigation bank today and into the future?
2. Your benefits vs; costs analysis should be more transparent.. Explain your costs and corresponding benefits such as: How many more fish will be in the river and at what cost? What happens to property values between the water haves and have nots? How many fish are in the Dungeness today and what are your projections in 5-10-20 years?
3. DOE mentions the term "timely & reasonable". What rule or person defines this term?
4. What storage options has DOE considered?

5. What is the DOE analysis of recharge contribution to the watershed from septic systems and outside watering?
6. Exempt wells that are drilled and capped should be exempted from this rule.
7. What are the impacts of using different control point gages? USFS gage vs. Ecology gage and how well do the in stream flow gages represent the flows in the rest of the river?
8. What are the projected administrative costs of the water bank and if there are profits where would they go? How much will it cost to purchase a water right? NOTAC is uncomfortable with the water bank administering water allocations as a non profit, unelected board that does not represent the citizens of Clallam County.

The Department of Ecology needs to do more public outreach to inform the public that will be impacted by the proposed rule. This is too complex an issue to presume that if only a few have commented that the rest are not concerned. The North Olympic Timber Action Committee is asking the Department of Ecology to delay the final rule until there has been more outreach to the affected landowners.

Respectfully,

A handwritten signature in black ink that reads "Carol Johnson". The signature is written in a cursive, flowing style.

Carol Johnson

Executive Director