

From: parealty [REDACTED]
Sent: Thursday, June 07, 2012 1:18 PM
To: Wessel, Ann (ECY)
Subject: No Benefit to Dungeness Watershed

In the 1940's, there were 949 farms with milk cows, in the Sequim-Dungeness Valley. The irrigation was flood irrigation, with high withdrawals off the Dungeness River. Yet, there were plenty of fish. Even with the increase in population, the amount of water pulled from the Dungeness River now is FAR less than what was used in previous times.

There have been many water rights that have been relinquished, from the Dungeness River, Matriotti Creek, Sieberts Creek, Casselary Creek, and more. In addition, the Water Users' Association (Irrigators) use far less water than they did in the past. The Dungeness Watershed is NOT over-allocated (except on paper). There is no reason to close this basin.

Ecology's Cost-Benefit Analysis says that 457 mobile homes in the area "would build a permanent house on site in the next five years..." And, would thus, use more water. These homes ARE permanent homes! And, even if they would change to site-built homes, the family size would remain the same, as would the water usage.

One of the main reasons for this Water Management Rule, is the threat of a lawsuit, or lawsuits. The estimate of the predicated lawsuit is a 14.1-27.7 percent predictability. We are going to cost the residents of the Eastern portion of Clallam County a major hit to their rural quality of life, an increase in county and state enforcement personnel, the expense of a new Water Exchange bureaucracy, mitigation and metering costs, and a reduction in the value of raw land, for a less than 30% chance of a lawsuit? It seems to me that, with the Rule, there will be lawsuits, by those whose property has been devalued, due to lower water use availability, the costs, and the chance that there might be no outside water available.

Ecology's Cost-Benefit Analysis says that 6.2% of the people in the Dungeness Watershed would have to "forego outside water use." Because these are properties above the irrigation diversions, and possibly, properties in the Bagley Creek and Casselary sub-basins, I think this figure will be higher. In addition, most of these properties do not have access to irrigation water. This will cause a dramatic reduction in the value of properties, in these areas. The CBA says that the impact is \$1,000 per household. In reality, it is much more. There is no reason, in a rural

area, that those properties will be purchased by a Buyer, when there are other properties that allow outside water use. Gardens, berries, orchards, etc., are highly valued, in our rural communities.

To say that this Rule will be a huge benefit to the Dungeness Watershed community is a fallacy. Currently, properties are able to have wells drilled, and to use them. There is no reason to close our basin, as we are using less and less water, all the time. Irrigation/Agricultural water was the biggest water use, in the past. The irrigators have cut their water usage dramatically. The entire impact of all the permit exempt wells is very small. The Cost-Benefit Analysis is not a true picture of what is occurring in our Valley.

Please listen to the local people, and do not force this upon our community. It is unnecessary.

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