

From: Marguerite Glover [REDACTED]
Sent: Tuesday, June 26, 2012 9:22 PM
To: Wessel, Ann (ECY)
Subject: Formal Comment on the Dungeness Water Management Rule

Ann Wessel, Instream Flow Rule Lead

Dear Ann,

We all know that the Dungeness River naturally gains and loses, along its course. Simonds and Sinclair (2002) discovered that the Dungeness mostly loses water, between River Miles 11.8 and 3.6. This is a natural condition for the River. It has always lost water, and fed the groundwater. It will continue to do so. In the Dungeness Watershed Plan, Page 2.8-11, it is noted about the Simonds and Sinclair studies, and the Thomas studies, that "the general picture to emerge from their work is that the Dungeness River gains predominantly in its lowest 3 miles; gaining reaches are localized, and are associated with locally unique conditions (e.g., a clay layer found at Schoolhouse Bridge)." Dave Nazy also looked at the difference in flows, between the USGS gage (R.M. 11.8) and the Ecology gage (River Mile 0.8) near the mouth of the River. In a March 01, 2012 email, to Tryg Hoff and Bob Barwin, Dave said, "reduction in stream flow between the gages is in part, related to groundwater withdrawals and consumption although I think this impact is small when compared to several other factors." Man's impact on the River, via wells, is small. The benefits that we are obtaining from this Water Management Rule are miniscule, compared to the costs. We are not putting any more water back in the River. We could make as much impact, by having more education programs, for well users, about proper water use and conservation. On the other hand, this Rule is taking value away from property, and giving us large costs in terms of more Ecology staff, county staff, oversight, salaries for people in the Washington Water Trust, transfer and administration fees, etc.

It is peculiar that, when you use Ecology's mitigation calculator, to find your well's impact on the River and streams, you find a higher impact in the deeper aquifer, with coastal wells. Why is that? When you are on Jamestown Road, or Marine Drive in Sequim, how are you affecting the River much at all. Do the artesian wells take water from the River and the streams? Or, was that water that would have gone to the Strait? What are the margins of error for the mitigation calculator? And, how was it proofed?

The Dungeness Watershed Plan talks about flows in Matriotti Creek. It states that "Occasional measurements of Matriotti Creek have shown values as high as 20 cfs, but more frequently in the range of 5 to 10 cfs (DQ Plan 1994). Matriotti Creek listed for low flow on the Surface Water Source Limitation (SWSL) list in 1952." I will make a comment about Matriotti that I had previously made about Casselary Creek and Bell Creek. Why do we have to try to compensate for creeks that would not have carried water, consistently, year-round, without help from leaking irrigation ditches, and/or direct input from

irrigation ditches? Note the following, from a Technical Memorandum to Ann Soule from Peter Schwartzman of the Pacific Groundwater Group:

In 2005, when irrigation diversions were reduced to zero or very low levels during late summer to restore Dungeness streamflow for fish passage, Matriotti Creek was dry at Woodcock Rd. (approximately RM 3). The Agnew District tightlined laterals that previously fed into the Creek, especially in the past 2-3 years. After Sept 15th, the end-date of the irrigation season, much of the middle and upper creek dries up. (pers. comm., Hals and Jeldness, 2007). Bedrock is absent in the Matriotti Creek channel, except near its headwaters (**Plate 2**).

Yet, in the Dungeness Water Management Rule, the Instream Flows set for Matriotti Creek are: 14 cfs for January, 10 cfs for February, 27 cfs each for March and April, 18 cfs each, for May and June, 5 cfs each, for July, August, September and October, and 14 cfs for November and December. When Matriotti Creek "frequently" had 5 to 10 cfs, and dried up at times, how can we give this creek these water rights? Due to the method used, toe width, which often comes up with a figure larger than real life, we have this problem for most, if not all, of the smaller streams.

The well usage in the Sequim-Dungeness Valley has very little to do with stream flow, in the creeks, or in the River. The focus should be on irrigation usage, and large withdrawals, such as the City of Sequim and the PUD. But, this has obviously become a political issue. One that, if successful, will take rights from many citizens, to use their water beneficially, for gardens and domestic use. To foist this Water Management Rule on well users, will cost them much more than the perceived benefit. We saw no threatened lawsuits. If there were threatened, then, bring them forward, into the light. With the Rule, there will be lawsuits from property owners, who will see their rights dwindle. Why was that not considered?

Sincerely,

Marguerite A Glover

