

## Protect the Peninsula's Future Delegate Comments

Protect the Peninsula's Future (PPF) is a nonprofit public benefit corporation registered in Washington State since 1973 and dedicated to environmental protection, so as to enhance the quality of life for present and future citizens of the North Olympic Peninsula.

Included in PPF's efforts to monitor various public agencies regarding proposed land and water uses that could impact our environment has been ongoing participation by a member of its board in the watershed stewardship provided by the Dungeness River Management Team (DRMT).

As the current PPF delegate to the DRMT, I appreciate the opportunity to summarily provide comments on the Dungeness Instream Flow Rule, Chapter 173-518 WAC.

- 1) Besides the extensive and intensive work provided by Ecology staff to provide an understanding of this rule and its intent to manage our watershed's water resources consistent with the prior adopted Plan recommendations, Ecology's assistance in directing public funding for watershed projects is acknowledged and appreciated.
- 2) Based on background information (such as provided in the series of Dungeness Water Watch publications), the proposed rule appears to be properly founded on use of BAS and IFIM.
- 3) Some concerns regard: i) the validity of the rule's economic analyses (County has noted salient concerns of impact on property values for undeveloped parcels); ii) where is the verification of referenced "reserves" and the metrics used for accounting; iii) complexities of mitigation procedures – and again the metrics needed for the accounting – seem overly burdensome.
- 4) Regarding seasonal closures (which per BAS are justifiable), has DOE been enforcing certificated water users such as City of Sequim to reduce use of DR Infiltration Beds during critical periods? <A recent review/calculation of 2010 and 2011 data seemed to indicate Sequim getting ~16% of its supplies from this DR main-stem source, even though a condition was placed on its water certificate to reduce use from this source; please check data on this matter.>
- 5) County has plans to have Carlsburg UGA develop to such an extent as to justify costly STP. Where is the water to come from that will need the treatment?
- 6) One local water resource reference noted that water lost to CARAs was consumptive use. How do urban areas, or those with extensive impervious surfaces mitigate for their impacts on the watershed?

Ecology has been instrumental in having water user stakeholders come together to discuss and solve problems. (Witness DRMT, LLWG, and the incredible improvements to water management developed by/with the Sequim-Dungeness Water Users Association.) Is there a possibility the Rule could set a "target" and let the locals agree on plans to try strategies, measure success, and reiterate as needed - true adaptive management?

PPF will continue to support protection of our environment in the public interest and looks forward to Ecology's response to these and others' comments regarding the proposed rule.

Submitted July9, 2012 by Judy M. Larson