

From: pcameron [REDACTED]
Sent: Monday, July 09, 2012 2:04 PM
To: Wessel, Ann (ECY)
Subject: Emailing: My objections to the implementation of the WIRA 18 Water Rule are

My objections to the implementation of the WIRA 18 Water Rule are below:

1. There is a lack of particulars on how the Rule will actually be implemented i.e. there are too many details left out that need to be worked out BEFORE - NOT AFTER - the Rule takes effect.
2. The science supporting this Rule does not appear to have a very good basis. Kind of reminds me of a collage class I took on "How to Lie With Statistics".
3. If you are serious about saving the fish in the Dungeness River - do what they used to do when we had lots of fish - dredge the river. This would not only get rid of the silt build up by the dike but would create a deeper channel (with pools, of course) so the river would flow better. Plus, it could supply a lot of sand/gravel to the county and other government agencies for roads/trails/etc.
4. The Water Trust group does not appear to be anywhere near ready to deal with mitigation or the development of holding ponds for recharge and/or irrigation. When asked some simple basic questions about how they will implement these programs all you get is "I don't know". Not a very satisfying response from a group that is supposed to be able to grant water rights as soon as the Rule takes effect.
5. Why aren't Johnson and Jimmiecomelately creeks in WIRA 18 as opposed to WIRA 17? Both go through the Sequim Valley and drain into Sequim Bay I also understand the WIRA 17 doesn't regulate that area but....will in the future?. Does that mean it will be regulated after future development has already taken place in that area?
6. How - with any kind of a straight face - can you allege that land without the ability to put in an exempt well has the same value as land with an existing exempt well or land that has the ability to put in an exempt well without having to "mitigate" that well? Give me a break! The loss in land values by itself would make the cost of the Rule outweigh it's benefits. Your arrogance astonishes me.
7. Since people can't sell water rights they don't use (5,000gal/day minus actual water used) because ecology says the unused water rights have already been relinquished, where are all the water rights going to come from for people who want water for their future homes/gardens? Additionally, since Ecology alleges almost every home owner in the valley has already relinquished unused water rights and the Water Users/ditch companies/districts have also relinquished a substantial number of water rights, doesn't that mean that the actual number of allocated water rights that exist are far less than the number of allocated water rights that exist on paper?

8. I can't believe the projected 0.7 to 2 cfs for all future development/houses in the Sequim Valley is going to affect a single fish!

9. If perforated pipes had been placed alongside the solid pipes when numerous ditch companies/districts enclosed their open ditches, water could have been put back into the aquifers during the high water months thereby preventing the wells in the valley from ever going dry. Why was Ecology in such a rush to pipe the ditches that they didn't do a test with the double pipes in Carlsborg as was considered at one time or just have the ditch companies/districts install the double pipes when they piped the ditches. Now Ecology mentions perforated pipes again. Kind of like shutting the barn door after the horse is gone. Ecology always seems to be in a rush to get things done without considering actual/all possible future consequences and that there might be a better way.

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