

**From:** Clarence Glover [REDACTED]  
**Sent:** Wednesday, June 27, 2012 5:18 PM  
**To:** Wessel, Ann (ECY)  
**Subject:** WRIA 18 comment for the record.

I would like make a comment for the record against the WRIA 18 rule. The target flow rates have been set at levels that the Dungeness river historically has never achieved. Over the past 50 years much of the on paper water allocation has been relinquished due to non use. As irrigation has decreased over the years the river has not conversely picked up any significant flow. Experts have calculated that the impact of the exempt wells in the Dungeness water shed account for around .2 to .7 cfs. of flow. Several of the larger water rights that are no longer used were for amounts of 4 cfs. Yet the river flow has not increased proportionately. Therefore it makes no sense that any form of management or manipulation of the water is going to raise the flow of the Dungeness to that which has been proposed as the target rate.

My second objection involves the water exchange. You are attempting to implement a rule that includes an exchange with neither any water or mechanism ready to make the system work. All information about the exchange and the process is at this point is hypothetical. No solid information can be obtained in regards to cost, or process.

My third concern is in regard to cost-benefit. There is no way that the proposed WRIA 18 rule will be cost neutral. There will be property owners of currently recognized and taxed parcels of land in the Dungeness water shed that will eventually find that they have unbuildable property. These parcels will most likely be absorbed by neighboring properties for a fraction of their current value or will be repeatedly sold by tax auction to people who do not realize that they cannot build on them. The majority of people who move into the Dungeness water shed are retired. The people who want to live in the county area where wells are used want to have a yard or garden, or fruit trees etc. Properties without outside water will never achieve the value potential as properties that have outside watering ability. This will impact the tax base in a negative way.

Sincerely  
Clarence Glover

[REDACTED]