

**From:** Marguerite Glover [REDACTED]  
**Sent:** Monday, July 09, 2012 4:13 PM  
**To:** Wessel, Ann (ECY)  
**Subject:** Formal Comment of the Dungeness Water Management Rule--lack of community buy-in

Ann Wessel, Instream Flow Rule Lead

Dear Ann,

I have mentioned these things before, but not to Ecology, formally.

Over decades, I have seen what many people in Jefferson County have referred to. They felt that there was not a community buy-in, with the WRIA 17 Water Rule.

When the Elwha-Dungeness Watershed Plan was in process, and finally approved, people in this community HAD gone on record, to say that they did not agree with the 180 cfs, planned as a water right for the River, for August, September, and October. This is NOT a flow that the River was able to achieve, often, historically. I thought that Ecology had a duty to make sure that there was water for People, Farms, and Fish. That was what one of your flyers said. We know that a flow of less than 180 cfs is enough to sustain fish, as in the past, there were lots of fish, with a Dungeness River flowing far less than that. And, aren't your rules supposed to set "minimum" instream flows? In the water groups I attended, we often talked about compromising, and doing something between minimum and 180 cfs.

The signators on the Elwha-Dungeness Watershed Plan include the Olympic National Forest. Yet, most of the proposed Rule is about limiting exempt well usage in the Dungeness Valley. How would new wells or new water uses, to the North, impact wilderness lakes, like Gladys Lake or Moose Lake or Moose Lake? I would think that most of their water would come from snow melt and rainfall in the mountains and foothills. Yet, ONF had input. So did the City of Port Angeles, which is not part of the Dungeness Watershed. Fish and fishermen were represented by the Lower Elwha and Jamestown S'Klallam Tribes, and by two sports fishermen. The Environmental Caucus and Protect the Peninsula's Future were there. An interested individual was there. The DRMT and Clallam County were represented. The Department of Ecology was represented. Gary Gleason represented "Education," I'm not sure what the exact group was. The Clallam Conservation District was there, as well as the Dungeness Water Users. Peter (Pete) Schroeder is shown as a "Riverside Property Owner." I like and respect Pete. But, he is an environmentalist, who happens to own some property on the River. The Economic Development Council was represented. So, there would have been some input for business. But, what about the small farmers? Where were they? I don't see them there. The well drillers? The people who represented those with hobby farms, and exempt wells? They weren't on the group. A representative did come from the City of Sequim. But, he was not a powerful player, as the City of Port Angeles was the larger water purveyor. Where was the PUD? They are a major water purveyor in WRIA 18.

Every water group I have been on, has had much influence and "pushing" from agencies. The agencies are always the ones who present the ideas for the "stakeholders" to talk about. They set the table, then try to get the people at the table to all buy in to their agenda. These directed consensus groups are time-consuming, and draining. It is hard to get salient points across when you are facing the disapproval of a group that knows where they are going, ahead of time. That is one of the reasons that people who work, simply aren't willing to invest the time in coming to the table.

Those of us on the Water Working Group, for the WRIA 18 East tried to have some good discussions, and make some good points. And, there was a well driller on that group. But, we didn't get to take any votes. We didn't get to know much about what the Executive Committee was doing. They didn't have any minutes for us, or the public, to read. And, none of us, or the public, was invited to any of Executive committee meetings, until late in the process. I don't think there were any business people on that committee; and, I don't know how any of them were chosen.

Yet, we hear that the Rule must be promulgated, as the Dungeness Watershed Management Plan laid out all of these things. I still remember, at one of the later meetings, long after the Plan had been adopted, when the specific idea of the "reserves," and how much water would be in them, was floated. No one had any idea that this would be part of the Rule. Maybe some people on the Executive Committee knew. But, those of us on the Water Working Group had not heard of it.

This has now become the Dungeness Water Management Rule. This Rule is not the ELWHA-Dungeness Watershed Rule. Don't you think the people who live and work in the Sequim-Dungeness Valley should have more of a say? They now have, in their public testimony, and their written comments.

I support our County Commissioners, the letter from our REALTOR(R) Association, and so many of the excellent letters which have been written from individuals and groups. I sincerely hope that Ecology will listen to all of us.

There are too many questions which are still unanswered. We need the answers BEFORE the Rule is in place, not after. And, if there is not community buy-in, then, who is it that you represent?

Thank you very much for listening to us. I'm sure that every one of us could have written many, many more comments.

Sincerely,

Marguerite A Glover

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