From: Marguerite Glover [redacted]
Sent: Thursday, June 07, 2012 11:21 AM
To: Marguerite Glover; Wessel, Ann (ECY)
Subject: Correction to my SBEIS statement

Dear Ann, my fingers were going faster than my brain! I meant to say that Ecology figures that a household on a well, in the Sequim-Dungeness Area, uses about 150 gallons per day, of water, of which 15 would be consumptive, if the people are on a septic system. Sorry about the error. Marguerite

From: [redacted]
Sent: Thursday, June 07, 2012 8:33 AM
To: Ann Wessel
Subject: Dungeness Small Business Economic Impact Statement

To: Ann Wessel, Instream Flow Rule Lead
WA State Dept of Ecology

Dear Ann,

In the unincorporated areas of Clallam County, there are many small home businesses and home-based industries. There are also some commercial businesses, on well and septic--but, not that many. Most of those would be on City water or PUD water. Most of all of our small businesses would have a recharge to the aquifer, from their septic systems. These are not hazardous, toxic wastes (ie, no dry cleaners, out in the county). There are a number of fruit and vegetable stands, nurseries, small engine repair (they capture their oil, anti-freeze, and freon--it does not go down the drain), bookkeepers, greenhouses (to serve commercial nurseries, not on site), a couple (or few) breweries or wine producers (some bring the product to other sites), day cares, bakers (who mostly sell to restaurants or bakeries), chainsaw carvers, clay pot makers, weavers, painters, photographers, crafts or hobby creators (generally sell on-line, or at arts and crafts fairs), etc. Many different types of home-based endeavors, which we are very happy that our county encourages.

The Small Business Economic Impact Statement uses a report out of California (Gleick, et al), about "**Urban**" Water Conservation, to determine water use, per employee, by industry. How is this pertinent to the Sequim-Dungeness area--with the exception of those portions in commercial zones, on sewer?

Any hotels that we have or might have, would be on City or PUD water or community water, and sewer. We have the Growth Management Act, in our State. These types of businesses could not exist on a well and septic. Bed and breakfasts, do. Would they fall under "rooming houses", or "camps"? Since most of these operate like a large family would (bathing, washing, cooking), how could each employee use 302 gallons of water per day? In these modern times, we generally use water efficient dishwashers, wash machines, showers, and toilets. And, these bed and breakfasts are on a well and septic system. When Ecology has figured the water use for a household, they have figured about 105 gallons per day, per house/well, consumptive. Of course, under the proposed Rule, new bed and breakfasts would have to buy some outside water, to water their gardens, lawns, and flowers. In some areas, they will not be able to do this. And, in the areas in which they can, they will not be able to have the size of landscaping that existing bed and breakfasts do. This may impact their plans to the point where they will just decide not to do the project.

What is included in the businesses that provide "personal services"? Bookkeepers? Lawyers? Hair Stylists? Counselors? Investment people? Surveyors and Engineers? If it is most of these, out in our rural areas, they will be small shops/offices, on well and septic, or on community water and septic. How and why, would they be using 1,091 gallons of water per day? This is an incredible figure!

Maybe there would be a small business who would let you know how much water they typically use. Or, you can find a few of them on small water systems--and, you could determine the gallons per day of the system. Alternatively, there must be some kind of a rural water use report, with estimates out there. I do not find most of these estimates to be realistic, for our area.

In this report, it is mentioned that Ecology has determined that "the proposed rule will not likely have disproportionate impacts on existing businesses." The reason that the impacts would not be disproportionate is because all well users will have to suffer, in the same way. If a family adopts some kids, or they add on a bathroom, or add an orchard, or a business wants to expand, they will all have to mitigate, and spend money to buy additional water from the Water Exchange--if it is allowed and available. We don't even know for sure, how the Water Exchange will work, or what the costs will be! This is ludicrous. We are in a watershed where the irrigators now use far less water than they had in the past. A watershed where many stream and river water rights have been relinquished. The remaining minor impacts from the well users, most of whom replenish the aquifer with clean water, from their septic

systems, does not warrant all of these new regulations and costs. It is disingenuous to say that there will be no impacts on small businesses, and that the benefits of the Rule outweigh the costs. They most certainly do not.

Thank you for your consideration, and your time.

Sincerely,

Marguerite A Glover
[redacted]