

The Department of Ecology (DOE) is proposing a number of significant – even draconian – limitations on water usage in our area.

These limitations will ultimately stifle development, decrease land values, adversely impact the business-generated and real estate-related tax bases, and, likely, result in lawsuits over what could be construed as a government “taking” of land. Lastly, and perhaps more important, they will deprive citizens of the right to use their land in keeping with traditions established over many years.

In the opinion of many, however, DOE has proposed a solution in desperate search of a problem... that there is no problem and, moreover, if there was, DOE’s proposal would have little impact upon it.

In essence, DOE’s scientists assert that there is a hydrological connectivity between aquifers and the waters flowing in streams and rivers and, furthermore, that an increase in the number of wells drawing from these aquifers will cause a corresponding decrease in the flow levels in the rivers.

Many other equally knowledgeable scientists contend that this supposed hydrological connectivity has not been proven and is merely a hypothesis. Moreover, if such a connectivity does exist, the effects of the wells on the flow levels is minimal and, therefore, the hardships inflicted on the general populace will far outweigh any potential benefits.

In fact, DOE’s own economist, Mr. Hoff, indicated that the probable costs of implementing the rule far out-weighed the potential benefits that would be achieved upon implementation. It should be noted that shortly after Mr. Hoff voiced his concerns, he was relieved of his duties and transferred elsewhere in the department.

Accordingly, we propose that you delay the implementation of the Instream Flow Rules until impartial studies have:

- Presented sound, peer reviewed evidence that said hydrological connectivity exists
- Confirmed that limiting water usage by well-users will have more than a passing affect on in stream flow levels
- Established that the In stream Flow levels mandated by DOE are actually achievable and are not impossible goals that have only rarely been achieved in past decades.
- Determined that DOE has the statutory authority to impose these limitations
- Reviewed the “unintended consequences” on property owners, tax bases, area development, etc

- More fully examined “creative” innovations to actually increase availability of water rather than merely concentrating on restricting usage. Such innovations could be water storage or banking whereby spring surpluses could be captured for use during times of lessened flow. (Maybe a reservoir or, even, a dam...)

“*First, do no harm*” is one of the principle precepts of medical ethics and means, given an existing problem, it may be better not to do something, or even to do nothing, than to risk causing more harm than good.”

If this philosophy is good enough for physicians, it should be good enough for you.

RA Pilling  
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