

Schroader, Kathy



From: Orjiako, Oliver
Sent: Thursday, September 17, 2015 1:29 PM
To: Euler, Gordon; Alvarez, Jose; Anderson, Colete
Cc: Schroader, Kathy
Subject: FW: Comments on Clark County Proposed GMA Alternatives - SEIS Etc.
Attachments: FRIENDS OF THE EAST FORK-GMA Wate-2r.pdf

Follow Up Flag: Follow up
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FYI and for the record. Thanks.

From: Richard Dyrland [<mailto:toppacific2@msn.com>]
Sent: Thursday, September 17, 2015 12:48 PM
To: Orjiako, Oliver
Subject: Comments on Clark County Proposed GMA Alternatives - SEIS Etc.

Oliver,

Attached are my comments on the GMA alternatives Water Resources Section.

I have so much background scientific material to draw from but time does not allow
To summarize in a much deeper substantive non-subjective content in my particular situation
Because of other very demanding water related project implementation work during the past
Few months.

Sincerely,

Richard Dyrland
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Board of County Councilors
Planning Commission Members
% Mr. Oliver Orjiako, Director
Clark County Community Planning
1300 Franklin Street, 3rd Floor
Vancouver, Washington 98660

September 16, 2015

Via pdf and e-mail to Oliver.Orjiako@clark.wa.gov

Mr. Orjiako:

Please accept these comments related to the Water Resources Section in the DSEIS and Comprehensive Plan update for the record on behalf of Friends of the East Fork. We continue to review the record and related data and analysis sources and believe that the following are important points for consideration by the decision makers and also for the record.

It is recommended that Alternative-1 be adopted by the Clark County Board of Councilors and the Clark County Planning Commission.

A point of clarification that we perceive has not been thoroughly recognized is use of the label "No Action" for Alternative-1. This is a misnomer that conveys to the general public and incorrect understanding of what the alternative is designed to achieve. No-Action implies a "static" program, when in reality it is a "dynamic" program that has undergone a number of transformations since it was first established and implemented. I would ask that future discussions and documents properly reflect these dynamic character of Alternative-1.

An adequate long-term supply of water is a key component of sustaining a population and economic growth. It is well documented in scientific data, analysis, and numerous reports that the national and regional climate and water situation throughout the United States has been changing and continues to change at an increasing rate. Southwest Washington and Clark County are part of this.

Clark County and the Portland area have had a number of ground water and water studies done by the US Geologic Service, WA State Agencies, Clark County and others since the 1950's which identified aquifers, gathered data, described areas of contribution, developed water table levels, and characterized water relationships. These reports are about 10 years or more older. They do not reflect more recent accelerated changes in surface and ground water functioning, conditions, and impacts (Columbia University Water Center. 2014. Assessment of trends in groundwater levels across the United States). As a professional hydrologist who has worked at the regional and national level, I have reviewed all of these older documents as well as new data and analysis to arrive at an updated view of the water situation and trends in Clark County.

A review of the WA Dept. of Ecology Well Reporting and Mapping system shows major expansion of wells in areas outside of cities and towns. A checking of some areas indicates that for some reason or other, as much as 20% to 30% of the existing wells are not shown on the Ecology maps. The inference is that we are using a lot more ground water and using it faster than we did in the previous 10 to 15 years in Clark County. It is not just the substantial increase in numbers of lots and acres of expansion that are of concern particularly with Alternatives 2 and 4, but also the location and characteristics of these proposed changes.

Rates of storm water runoff, sedimentation, lower infiltration and recharge rates are increasing problems in Clark County. Analysis of stream gage data shows that storm events of a given magnitude are producing higher levels of stream runoff which results in reduced levels of recharge. There has been testimony at the County Councilor meetings over the last year where rural resident express concern about dropping well water levels and loss of entire well systems. In rural areas, accelerated expansion of roads, more wells, which along with associated impacts, will accelerate the rate at which recharge is being reduced. The various aquifers involved are not independent as some may think, and there are areas of interaction between them.

There is much use of the term "mitigation" in the discussion of the alternatives and the related direct and in-direct and cumulative effects. After living in Clark County the past 21 years and spending a considerable amount of time gathering and analyzing data on the numerous streams and in the various watersheds, my conclusion is that almost all sectors of "mitigation" are either being consistently misused, to circumvent a range of County, State, and Federal protection and management regulations and laws or are basically ineffective. These were established to protect basic resources from permitting that allowed improper road and building expansion ---but in most cases the mitigation does not work. Shorelines regulations have "No Net Loss" requirements, yet there are a number of recent examples to show that even under current rates of growth, the County is not meeting regulation obligations. **The cumulative effect of all of this also has a substantial negative impact on fish and wildlife in Clark County and Southwest Washington.**

Clark County is having difficult times in meeting short-term and long-term water management needs under implementation of the current growth patterns and impacts of Alternative-1. Under Alternative-2 impacts become much more wide-spread and substantially increased. Alternatives 3 is similar to Alternative-1 but has a moderate increase in impacts. Alternative 4, is not even feasible and the economic and physical costs of trying to recover from Alternative 2 or 4 would be prohibitive, have substantial long-term negative impacts on the citizens of Clark County ---and over time might result in a shift to a loss of population and stagnation of economic activity, or at the very least, very high physical, social, and economic costs to sustain.

Again, it is recommended that Alternative-1 be adopted by the Clark County Board of Councilors and the Clark County Planning Commission.

Respectfully,

Richard Dyrland

Board of Directors, Friends of the East Fork, 27511 NE 29th Ave., Ridgefield, WA 98642