



ADVOCATES OF GOOD LAND STEWARDSHIP

April 30, 2006

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EPA, Region 10 (OEA-095)
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RE: Petition to Designate the Troutdale Aquifer as the Sole Source Water Supply for Clark County, Washington

Dear Ms. Lentz:

The Friends of the East Fork, Lewis River supports the petition to declare the Troutdale Aquifer as the "Sole Source" water supply for Clark County.

A number of our members, including myself, are retired federal geologists, hydrologists, and resource planning analysts who have done extensive reviews of scientific studies of both surface and subsurface water regimens and watershed conditions in the Portland-Vancouver area. The USGS papers by M. J. Mundorff, 1964 and G. L. Turney, 1988, the updated and more intensive geologic maps were just starting points in our review and analysis of data and information. Some of us have worked multi-regional throughout the western United States and are very much aware of the history and consequences of ground water source depletion and contamination.

The following concerns support our position to have a "Sole Source" designation made:

1. Municipal, industrial/commercial, and rural/domestic water use in Clark County is

heavily dependent on Troutdale and Troutdale related aquifers. The population growth in Clark County is putting an exponentially growing demand on ground water.

Until just recently, the history of storm water and runoff disposal in Clark County is one of "conveyance" rather than infiltration. With the rapid increase of home building and business expansion, large areas of hard surface are being created. What few infiltration systems that are being installed are not adequate or are relatively ineffective for long-term recharge

Not only is this true in urban or city areas, but rural areas are also part of the growing concern. Even the headwaters of our watersheds have real and problems. The USDA-Forest Service studies of runoff water disposal on the GIP-National Forest Lands indicate that roads and culverts have changed how the land processes water runoff by as much as 35 % in some sub-watersheds. Less is going to infiltration.

2. Pulling more water directly from streams in the area is not a feasible option. The Water Resource Area 27/28 Report and studies indicated that most streams are already over allocated. In addition, during the critical low-flow summer months, “Threatened & Endangered” listed salmonid and steelhead parr as well as holding adult populations (Chinook, Coho, Chum, and Steelhead) are subject to lethal temperatures and lack of adequate habitat components to prevent over-stressing. Adequate and timely volumes of water are simply not available from stream flow.

3. Surface and ground water pollution/contamination is already a problem in Clark County. The EPA is very much aware of this and the sites involved (e.g. Ridgefield

abandoned wood treatment plant site). These alone are a major incentive to grant the sole source designation and appropriate protection/management to this critical aquifer.

4. We have been gathering data and conducting hydrologic and hydro-geomorphic analysis of the East Fork of the Lewis River watershed and reaches of the stream for several years. Our own stream flow metering at various key reaches in the lower part of the river indicates there is Troutdale Aquifer recharge occurring from the East Fork. It begins near Lewisville Park where the geology changes to a deep layer of sandy cobble gravel alluvium (QA). The Troutdale formation is also exposed along various locations in the alluvial valley walls.

In addition, there is a “Syncline” (K. A. Howard, USGS Updated Battle Ground Quadrangle Geology Map, 1999 Survey) that may be drawing some of the river flow directly into the Troutdale Aquifer. The ground water regimen in the lower East Fork has been severely impacted in the past by six in-stream deep gravel mines. And until recently, there was gravel mining in the channel migration zone (CMZ). Washington State Dept. of Ecology reports identify that the mining pits entered the aquifer and that a significant amount of ground water flow is now going out the system as year around surface discharge. The East Fork itself needs much better management and protection of the surface and ground water system. It has an important relationship with the Troutdale Aquifer.

In summary, we urge you to use these four concerns as well as others, to support the determination that the Troutdale Aquifer be declared “Sole Source” for Clark County, WA.

Respectfully,

Richard Dyrland, President

Friends of the East Fork Lewis River

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Sole Source Aquifer Designation – Clark County, WA Dec. 7, 2005

This Is A Personal Statement By Richard Dyrland. A Statement By The Board Of FOEF May Also Be Made When The Board Meets Later This Month.

A designation of “sole source aquifer” in the Clark County area would be an important step forward in the long-term protection of key water sources for the current and future residents of the area.

There is a growing body of information that indicates we are depleting our ground water levels and that an increasing amount of critical ground water recharge is being lost to surface runoff ---resulting in less recharge and lower summer flows in some streams that support “Threatened & Endangered” salmonid fish.

Designation as a Sole Source Aquifer will provide the incentive to develop and implement an effective regional “land stewardship” program to reverse this impact on our ground water sources.

Richard Dyrland, President

Friends of the East Fork Lewis River