Friends of Curtin Creek John Bishop, Director 14333 NE 87th Avenue Vancouver, WA 98662 Phone: (360) 281-4118 Fax: (360) 574-8627 bishopig@earthlink.net

January 20, 2006

Martha Lentz, Office of Environmental Assessment U.S. EPA, Region 10 1200 Sixth Avenue Seattle, WA 98101

Re: Troutdale and Unconsolidated Alluvium Aquifer System

Dear Ms. Lentz,

I am writing on behalf of Friends of Curtin Creek in support of the designation of the Troutdale and Unconsolidated Alluvium Aquifer System (TUAAS) as a sole source aquifer. Curtin Creek is a tributary of Salmon Creek that flows across the boundary between rapidly developing urban areas of Vancouver and rural lands of Clark County. Friends of Curtin Creek is a non-profit organization dedicated to the conservation and stewardship of lands in the Curtin Creek watershed, and the connected watersheds of Salmon Creek, for fish, wildlife, and quality of life. Although we are not a membership organization, we operate with the support of many landowners in the watershed. Recent rapid commercial and residential development taking place in the headwaters of Curtin Creek and along its length are negatively impacting water quality and associated aquatic communities. Many of these lands are category 1 and 2 aquifer recharge areas.

Streamflow and water quality in Curtin Creek and Salmon Creek watersheds depends heavily on groundwater discharge. Consequently, we strongly support efforts to protect drinking water quality. We are extremely concerned that all the drinking water in Clark County, as well as the water discharged to our streams, derives from a single relatively unprotected source, the TUAAS. That source is clearly threatened by many documented point and non-point sources of groundwater pollution, such as Camp Bonneville and numerous EPA superfund sites.

For example, as presented in the application, the Washington Department of Ecology (Ecology) currently lists 216 active cleanup and 12 federal Superfund sites in the proposed aquifer service area. These sites are known to have been contaminated and are undergoing cleanup. Many of these sites include plumes of groundwater contamination. Ecology also lists over 620 hazardous waste generators and nearly 280 hazardous materials storage facilities in this area. Water quality protection is critical to the health of Clark County's residents, its economic wellbeing, and its fish and wildlife. We cannot afford to allow more threats to develop. Therefore, it is vital that the EPA take steps to protect our sole source of drinking water.

Sincerely yours,
John Bishop, PhD.
Director, Friends of Curtin Creek.
Associate Professor, Biology, Washington State University