



September 27, 2008

PUBLIC COMMENT

RE: Applications: G1-28560 (Orcas Island), G1-28557 (San Juan Island), G1-28559 (Lopez Island); and G1-28558 (Shaw Island)

Department of Ecology  
CASHIERING OFFICE: NWRO-WR  
Water Resources  
PO Box 47611  
Olympia, WA 98504-7611

Department of Ecology  
Water Resources  
Northwest Regional Office  
3190 -160<sup>th</sup> Ave SE  
Bellevue, WA 98008-5452

Dear Department of Ecology:

Friends of the San Juans ("Friends") respectfully submits the following comments on the pending four (4) rainwater catchment applications for each of the four ferry served islands applications: G1-28557 (San Juan), G1-28558 (Shaw), G1-28559 (Lopez); and G1-28560 (Orcas).

In general, we concur that there is a need for rainwater catchment in the San Juan Islands; however all four applications fail to identify how in-stream water flow will be assured for fish and wildlife, wetlands, forests, coastal lagoons and agricultural lands.

Given the ambiguity in the amount of water to be intercepted and the uncertainty we face with our changing climate, at a minimum it seems DOE should provide a remedy to assure a historic level of in-stream water flow into our streams, coastal lagoons, wetlands and agricultural lands in San Juan County.

Findings from the Wild Fish Conservancy (WFC), Kwiaht, and other researchers have identified *Oncorhynchus* spp in eight (8) streams on Orcas and San Juan islands (see attached map):

- Doe Bay (coastal cutthroat, *O. clarki clarki*, apparently landlocked; adults brought to hand in May 2004 and April 2007, and videotaped in situ July-August 2007).
- Pickett Springs Creek (coho, *O. kisutch*; adult brought to hand in May 2004); this stream is currently being realigned by People for Puget Sound to enhance salmon habitat.
- Cascade Creek (cutthroat; coho; and introduced brook trout, *Salvelinus foninalis*; adults of all three species brought to hand in May 2004 and again in April 2007 by S. Boessow of WDFW; juveniles videotaped in situ in August 2007).
- Victorian Valley (Bayhead) (sea-run cutthroat; adults brought to hand May 2004).
- Crow Valley (Westsound) (chum, *O. keta*; juveniles brought to hand May 2004).
- Skull Creek (West Sound) (rainbows, *O. mykiss*; both juveniles and adults brought to hand in May 2004).
- West Beach (sea-run cutthroat; adults brought to hand in May 2004, and juveniles videotaped in situ in July-September 2007).
- Garrison Bay-Mitchell Hill (sea-run cutthroat; adults brought to hand April 2004, and videotaped in situ in August-September 2007).

It is our understanding that WFC will have additional findings of fish presence in San Juan County in the coming months.

In existing Class III Wetlands the Washington Department of Ecology and the State Board of Health may have specific regulatory authority over the use and/or improvements and design requirements for a community rain water system located in such a locations.

We understand that many different government entities are involved in regulating water use in both the State and the County. We recommend that steps be taken to ensure that any County action on this application be consistent with such regulations to assure in-stream water flow for fish and wildlife, wetlands, forests, coastal lagoons and agricultural lands.

Sincerely,

Stephanie Buffum Field, Executive Director  
Friends of the San Juans

Under protest, I am submitting a \$200 Check #1861 (“recording fee”) for public comment on Applications: G1-28560 (Orcas Island), G1-28557 (San Juan Island), G1-28559 (Lopez

Island); and G1-28558 (Shaw Island). I believe that charging a recording fee for public comment is a violation of due process and I request that my \$200 be refunded.