

Linda Ann Kuller

From: Jan Alderton <janetmalderton@gmail.com>
Sent: Saturday, March 4, 2017 7:36 PM
To: Comp Plan Update
Cc: Jamie Stephens; Rick Hughes; Bill Watson
Subject: Water Resources: A Key Issue for San Juan County
Attachments: Water Resources Element 2010.pdf; SJC 2008 Groundwater Report.pdf

Dear Erika Shook and County Councilors,

The Washington State Supreme Court's October 2016 ruling [<http://www.ecy.wa.gov/programs/WR/wrac/images/pdf/91475-3opinion.pdf>] has set a precedent that

"counties must ensure there is enough available water before issuing permits for new development in rural areas".

As a result, several counties, including Whatcom County, have stopped accepting building permits in rural areas.

Our 2018 Comp Plan Update needs to include a thorough analysis of current water availability in rural areas and evidence that the local water supply can support the proposed development.

San Juan County's 2018 Comp Plan Update *Scope of Work* does not supply an analysis of current water availability or the ability to supply existing and future development.

Instead, "No update required" is checked on the *public water supply* section of the GMA checklist. A 2010 Water Resources element is cited (see attached), but it is full of wishful thinking (goals), refers to "plans", but does not supply any actual data for rural areas with exempt wells.

The following documents cited in the 2010 Water Resources element do not apply to rural areas:

- Lopez Village Water Supply Report and Recommendations and Abbreviated Coordinated Water System Plan, 2003
- Eastsound Water Supply Report and Abbreviated Coordinated Water System Plan,

The 2010 Water Resources element does not supply evidence that our county can "ensure there is enough available water before issuing permits for new development in rural areas".

The *East Orcas Water Supply Report and Recommendations, 2006*

document would not be relevant to the very limited ground water in most of the Deer Harbor region.

All data for the water element of the 2018 Comp Plan Update should be easily accessed via hyperlinks and **must be more recent than 2003 or 2006** to "ensure there is enough available water before issuing permits for new development in rural areas" as required by the Washington State Supreme Court's October 2016 ruling.

A 2008 San Juan County Groundwater Monitoring Report concluded key issues for San Juan County:

- Very low recharge to aquifers,
- Seawater intrusion,
- Water right allocations by the state that exceed water available,
- Areas where current use of water exceeds aquifer capacity,
- Water development that is occurring primarily via exempt wells,
- Failure of many individual and community wells during summer months,
- Lack of capacity to serve areas designated by the county's GMA process for growth,
- A gap in responsibility and authority between state and county agencies,
- Lack of comprehensive monitoring and assessment of water resource capacity, and
- Lack of coordinated, cooperative resource management.

"Sodium concentrations were above the GWQC of 20 mg/L in all Lopez wells for both sampling events."

I expect that ground water quantity has not increased and salt water intrusion problems have only worsened since 2008.

Wells have been abandoned in my rural neighborhood in Deer Harbor on Orcas Island because of salt water intrusion. Many wells become inadequate in the summer months. The ever-increasing number of summer rentals are often occupied by visitors who are clueless about our water-limited islands.

Thank-you for your consideration,

Janet Alderton

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