

Grant Beck

From: everyones@earthlink.net
Sent: Friday, May 22, 2009 4:59 PM
To: Jaym461@ecy.wa.gov
Cc: Grant Beck; secretary@doh.wa.gov
Subject: City of Yelm Water Rights Applications and Water Plan
Attachments: Pharmaceutical Pollute US Tap Water EWG 3-10-08.pdf; Study Reveals 17 Different Pharmaceuticals in Wastewater 12-13-07.pdf

Jay Manning
Dept of Ecology,

I would like to submit a few of my concerns regarding the Yelm Water System Plan and the associated Water Right Applications. As an Engineer who has lived and worked in this area for many years, I have been involved in a number of water rights applications for municipal water supply purposes. In my experience, even when legitimate and reasonable requests for water use were made they most often were denied. Even when reasonable applications for credits on water rights were made by supplementing minimum stream flow or by requesting to beneficially put to use water that was being pumped out and discharged into the Hood Canal to lower aquifer levels and stabilize a landslide they were refused.

Now I see that the City of Yelm has ignored and violated their approved water right limitations and have obligated themselves to supply water to residential developments already built and approved to be built without having water rights in hand to do so. No one else that I know of except for WDOT reacting to public safety issues is allowed to make plans, enter into obligations, and take actions that impact the waters of the State without first obtaining the water rights to do so. Although the City of Yelm has proposed ways to minimize the impact of its actions, I do not believe that all concerns have been addressed. To be more specific I list the following:

1. Significant drawdown of the aquifers will likely occur. What mitigation plan is in place to compensate individual well owners in the event that their wells run dry? Although the City may offer to provide City water to private well owners, I say that such offers often come at the additional expense of main extensions and connection fees, and continual rates to pay for the water. In particular in rural, low development density areas it is especially uneconomical to extend water mains to serve one or few houses, and given the City's financial situation they would likely be unable to afford to do it. So mitigation by supplying City Water to people whose wells have run dry will not be feasible for everyone and even those who already live adjacent to a city main will still have to pay more for water rates than they are paying now with their own well.
2. People whose wells run dry or have to be redrilled to greater depth may also experience higher levels of iron, manganese, corrosivity, and arsenic at those greater depths. This is potentially adding insult to injury as they may not only have to pay the cost of drilling and outfitting a new well but will also have to pay additional cost to treat the water and higher electrical and pump costs to pump from greater depths. What Mitigation does the City of Yelm offer for this?
3. The city is recycling water now and proposes to do more to provide more recharge of the aquifers as a mitigation measure. Given the increased awareness in pharmaceuticals being present in wastewater discharges and showing up in surface and ground waters throughout the county what mitigation does the city offer to offset the fact that they are taking out pharmaceutically cleaner water from the aquifers and replacing it with dirtier/more pharmaceutically laden wastewaters which will only be made worse by the much higher residential development densities and the higher pharmaceutically laden wastewater generated by the developments they hope to serve. I think that if the general population of the area knew how relatively unprotected by impermeable layers the aquifers are in this area, they might take exception to receiving ever larger doses of other peoples medication in their drinking water. I know that the EPA has not yet responded to the Pharmaceuticals found in drinking water but it is only a matter of time before they are forced to address the issue (see attached article on Pharmaceuticals in Drinking Water by the Environmental Working Group). Will the city of Yelm pay for activated carbon filtration for the private

wells that they have degraded the water quality of as a method of mitigation? Knowing how costly activated carbon is, I doubt the City of Yelm could afford it.

4. Although the City's water plan does try to gather the most revenue to offset the costs of upgrading their water system to serve these new residential developments, from new connections and new development, it will still be placing undue burdens on existing water users and customers to help pay for these new development obligations. New development obligations should pay their way completely without having to spread the cost of the development out among the customers of the water system who do not directly share in the profits obtained from such development.

In conclusion I would like to see the Department of Ecology require the City of Yelm to abide by the same water rights regulations that everyone else has continually been held to. More specifically I think a complete Environmental Impact Statement should be prepared for their proposed water uses that takes into account specific mitigation for items 1-4 listed above.

Sincerely

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