

Jessi Roberts

From: Wendy Steffensen <wendys@re-resources.org>
Sent: Thursday, January 28, 2016 9:37 AM
To: Cliff Strong
Cc: Oliver Grah; Kara Kuhlman; Ann Russell; Lee First; Kate Blystone; Diane Hennessey; Bert Rubash and Elizabeth Kilanowski; Joel Ingram; Dan McShane; Pete Sim
Subject: CAO process, CARA info, Wendy departure
Attachments: Art 5 CARA and 5.5 Lummi - CAC review 2015-08-05_WS_OG EDITS.docx; Art 4 FFA - TAC to ESA Subcom to TAC to CAC 2015-08-05-WS_OG edits_012516.docx

Hi Cliff-

Oliver and I met a few days ago to discuss the CARA section among other things. It turns out that neither he nor I were at the CARA meeting, and had not reviewed the material.

Please see here some additional comments from Oliver and I on CARA, and other issues.

1) Attached is an amended CARA section. Specifically see changes in 16.16.525 G, H and a new Article 5.6 to address the Abbotsford-Sumas aquifer. Considerable international focus has been placed on this widespread pollution problem and pollution of groundwater is a major environmental issue for both countries. Because pollution is an issue in this aquifer, testing of N and P should be standard for new wells, such as with Lummi Island. We don't have the details on what the measurements should be and we request that you get DOH to review and put some appropriate benchmarks in place. I will be able to supply you with some BAS on this subject, shortly.

2) Channel migration zones appears to be well addressed in the Geologically Hazardous Section, but not in the Frequently Flooded Section. See attached suggestions to the FFA section. We added channel migration zones in 16.16.410 A and 16.16.420 B.

3) When reviewing the BAS report from 2005, I note that there are summary sections called "Findings and Code Recommendations". I remain concerned that our search for BAS has been a bit haphazard, depending on expertise on the TAC and available volunteer time to research issues and recommend appropriate code. While you contend that there has not been much "new" science that might be applied to the CAO, that contention doesn't seem substantiated. I am concerned that we may have missed BAS, not discussed what the BAS means, and not made the appropriate recommendations for code. I know that the extra reviews that Oliver and I contribute do contribute more to your workload. Unfortunately, without a paid consultant doing review at the onset of the process, I fear that this process will remain bumpy.

In the current BAS review, it seems that it would be a tighter document if there was a better connection made between the BAS and the code recommendations. The updated BAS report should have been developed prior to the CAO-TAC work in updating the CAO. There needs to be tracking on BAS items that are not incorporated in the CAO update such as in the Staff Report. In other words, there will be BAS and BAS recommendations that are not included in CAO update. Decisions to not incorporate such in the CAO must be addressed in the staff report..

4) How will we reconcile the TAC and CAC versions. It is possible that the CAC made changes that the TAC would not agree with and vice versa. What is the process to find and discuss those? Staff decisions to act on the inconsistencies between the TAC and CAC must be addressed in the staff report.

5) Are there outstanding items unaddressed or not completed by the TAC that we should be aware of? For instance, Oliver provided information on alternatives analysis, cumulative impacts analysis, levels of CA assessment, etc. and there is no specific documentation on if and where that input was addressed.

6) Will there be a separate Staff Report prepared? If so, and if the report is based on the TAC work, shouldn't we review it before a draft is finalized?

7) Lastly, I want to tell you that I am moving on to a new position at the LOTT Clean Water Alliance in Olympia. My last day is Friday (tomorrow!). Lee First will be taking over the RE Sources TAC role. She has experience in wetland science, landfill operations, and stormwater issues. I have thoroughly enjoyed working with you and others on the CAO. Thank you for all your efforts to keep it on track.

Thanks!

Wendy

--

Wendy Steffensen, North Sound Baykeeper
North Sound Baykeeper Team
RE Sources for Sustainable Communities
2309 Meridian St.
Bellingham, WA 98225

360 733-8307, x208 (office)
360 223-6707 (cell)