

Craig Parkinson

Thank you for the opportunity to comment.

I attended the open house in Ferndale yesterday, April 22nd. In the spirit of improving future events, please know that the room was packed, and I could not get close enough to an Ecology representative to either see what they were talking about, or hear what they were talking about. I had comments I would like to share, but was unable to in that venue. For that reason, my voice went unheard, and I am sharing my comments in this on-line forum.

It is my understanding that it is proposed that rural exempt wells will be limited to 500 gpd. For many people this value is much too low. I know this from personal experience having lived in rural Whatcom County for over 30 years, and also as a licensed Civil Engineer with experience working on rural water systems.

State of Washington Department of Health guidelines for potable water systems require planning for a minimum of 800 gpd. This holds true for Class A and Class B water systems. This I believe is an average, and it is left to the engineer to justify higher or lower daily volumes when preparing a Water System Report. Of this 800 gpd, half is earmarked for potable use within the home, and half for other uses. Add livestock and/or agricultural uses and the volumes go up considerably.

Whatcom County Code for design of septic systems requires designing On Site Septic systems for 150 gallons per day per bedroom. Under the proposed Ecology rule, homes would be limited to three bedrooms. This would preclude building a home for a large or intergenerational family, and strikes at the liberty of those wishing to live their lives with their families in a rural setting.

In my own personal situation, I live on five acres, and have a low producing well. For this reason I have learned to conserve water very carefully. Even at that, keeping below 500 gpd is not possible in the summer. During the summer, my family uses 200-250 gallons per day for domestic use. With a large garden, we also spot water to keep plants healthy. Because of our low flow well, we do not sprinkle, but spot water only, and do that early in the day to limit evaporation. We also have two horses, which can easily drink 100 gallons on a warm day.

All this being said, as someone that tries to conserve water as much as possible, 500 gpd is simply too low. I am certain there are others that have larger gardens, or more livestock, or other reasons to use more water. While I personally agree that the previous 5,000 gpd is probably too high, likewise 500 gpd is much too low. I suggest that one size does not fit all, and something in the middle would be more appropriate if you must have a one-size-fits-all rule. You will still have people like me that try to conserve, and will not try to use all of the water that is allocated.

One last item for person wells. I strongly oppose metering water. This smacks of a future charge for water. I have heard people say that people get water for "free" in the County. This is untrue. I have my own well that I paid to install, and pay to maintain. I have a cistern and water treatment system that I pay to upkeep so that I have potable water. These are not "free" costs, nor do I expect anyone but myself to pay for this upkeep. The point is, there is no "free" water, and I would prefer that the government keep their hand out of my pocket on the premise that it is. Additionally, if a tax is imposed on metered well use, then everyone, not just exempt well owners, should pay. If the issue is Nooksack River instream flow, then everyone affecting it should be responsible, not just exempt well owners.

Another thought I would like to share is providing credit to instream flow when it is proven to exist. In the past I have worked with the Cities of Sumas, Nooksack and Everson. Water supplied to the City of Nooksack and rural water associations in the area is provided by wells located in Sumas that are fed from an aquifer that flows from the north. In the case of Nooksack, much of this flow is directed to the sanitary sewer system which in turn flows to the Nooksack River after treatment in the Everson treatment plant. Is credit given to the INCREASE in instream flow. Similarly, the Nooksack Valley Water Association (NVWA) also gets water from the same aquifer in Sumas. All of the customers of this rural association have on-site septic systems, and therefore add water to the Nooksack River Basin system. Is credit given for this?? Nooksack and NVWA customers number in the many hundreds of homes. Does this not provide offset for other homes in the basin??

One other issue exists that I believe deserves due consideration. It is my understanding that the Georgia Pacific Mill in Bellingham had a 30 million gallon per day diversion (or right to it) from the North Fork of the Nooksack River, routing it through Lake Whatcom before being piped to the mill and then Bellingham Bay. That mill is now closed. How much of that old right was returned to the river?? If instream flow is that big of an issue, then surely this was considered, correct?

It is my opinion that the effect of exempt wells on Nooksack River instream flow is largely overblown. There are better uses of my tax dollars than this misguided effort.

Thank you again for the opportunity to comment.