

29 October 2008

Ms. Jennifer Anthony
Project Assessment Manager
Environmental Assessment Office
P.O. Box 9426 Stn. Prov. Govt.
Victoria, B.C. V8W 9V1
eaoinfo@gov.bc.ca

Dear Ms. Anthony:

Thank you for the opportunity to comment on the Environmental Assessment of the Proposed Goundwater Supply Development for the Bevan Avenue Wells, Abbotsford, B.C. After internal discussions in Washington Dept. of Ecology's Bellingham Field Office (Ecology), in consultation with the WRIA 1 (Nooksack Watershed) Watershed Planning Group, we have the following comments.

General Comments:

Although the proposed increased pumping is estimated to occur for less than 100 days per year, the period of increased withdrawals will occur during the summer months, when rainfall is least, stream flows are lowest and groundwater levels are decreasing. Accordingly, impacts of the project to the Abbotsford Sumas Aquifer and affected streams should be carefully evaluated.

The project's Zone of Influence (ZOI) should be based on influences to the entire Abbotsford Sumas Aquifer and Bertrand, Pepin and Fishtrap creeks. The ZOI should extend across the US-Canada boundary where appropriate (this appears to be confirmed in Section 5.3.4 Surface Hydrology, in the Terms of Reference).

Aquatic Habitats:

Fish species of concern should include Nooksack dace and Salish sucker (noted in Terms of Reference Section 5.3.2 Aquatic Fauna), but also Steelhead trout and Coho and Chinook salmon.

First Nation Setting:

The Lummi Nation and Nooksack Tribe should be included in the assessment of impacts to First Nations (Section 6.1 and 6.6 Effects Assessment).

Consultation with Key Stakeholders:

The following key stakeholders should be included in the consultation process: Washington State Depts. of Ecology, Health, and Fish and Wildlife, Lummi Nation, Nooksack Tribe, Bertrand Watershed Improvement District (WID), North Lynden WID, City of Lynden, Whatcom County Planning, Whatcom County PUD No. 1, Whatcom Conservation District.

We believe that by addressing these considerations the project proponent will adequately address substantive issues based on hydrologic and geographic characteristics of the affected area and will create a model of cross-boundary cooperation for future activities. Please contact Doug Allen if you have questions at 360-715-5217 or doua461@ecy.wa.gov.

Sincerely,

Richard M. Grout, Manager
Bellingham Field Office