



# **SNOHOMISH COUNTY FARM BUREAU**

13420 339<sup>th</sup> Ave SE, Sultan, WA 98294

January 24, 2013

Ms. Susan Eastman  
EPA Region 10  
1200 Sixth Ave. Suite 900, OWW-136  
Seattle, WA. 98101  
Eastman.Susan@epamail.epa.gov

Dear Ms. Eastman,

The Snohomish County Farm Bureau (SCFB) is in receipt of the Hydrological Evaluation of Leque Island Restoration (Groundwater Study) submitted by Pacific Groundwater Group (PGG) in December 2012, purporting to determine whether the proposed dike removal on Leque Island will adversely affect the North Camano Island Sole Source Aquifer. Thank you for this opportunity to present comment regarding this PGG Groundwater Study.

The feature of this study that we find of the greatest significance is that it very plainly shows *westward movement of saltwater into the aquifer*. This is wholly inconsistent with the "constant head barrier" allegedly presented by Davis Slough to the flow of ground water westward from Leque Island to Camano Island according to the ABC Consulting Report reviewed by Jerry Liszak of DOE and Doug Kelly, then of Pacific Groundwater Group.

It seems to us that this confirmed saltwater intrusion into the aquifer is sufficient of itself to induce a negative stance by the EPA toward the project. It also calls into question compliance with the antidegradation policy of WAC 173-200-030.

PGG claims however that notwithstanding this saltwater intrusion there is no risk posed to the drinking water of North Camano Island. We note, however, that this claim is based solely on computer models whose parameters are *poorly anchored to the site by empirical site-specific data*. No confidence can be placed in modeling with parameters drawn from surmise and generalization.

We also wish to propose that EPA host a live open forum at which all interested parties may present and may question other parties. We believe that the vetting afforded by such a forum would be of substantial assistance to the EPA.

Very Truly Yours,

Ed Husmann  
President