



**Jefferson County
Marine
Resources
Committee**

To: Jefferson County Commissioners
From: Jefferson County Marine Resources Committee
Date: April 2, 2018
Re: Pleasant Harbor MPD

The Jefferson County Marine Resources Committee (MRC) serves in an advisory capacity to the County Commissioners as well as providing educational programs, and promoting good stewardship, restoration and protection of nearshore habitats. We have several concerns about the proposed Pleasant Harbor MPD Agreement as it relates to water quality and potential impacts on local marine waters. Several important documents are inadequately defined in the draft Agreement and attachments, and we believe the following concerns need to be addressed before the County signs the Agreement. Here are our concerns:

1. **Stormwater:** A **Stormwater Management Plan** describing how stormwater runoff generated on-site will be treated and infiltrated onsite is not available for review. Does one exist? Appendix B only contains Jefferson County Code regarding stormwater. The 2007 FEIS, Chapter 5, section 5.1 (**Water Quality Mitigation, for Shellfish, as specified in DEIS at Section 3.2.7**) only mentions a construction stormwater plan, which is only one part of an overall Stormwater Management Plan. That Plan should include ongoing monitoring of the stormwater system to ensure that it is working properly with an annual inspection report of stormwater facilities and vaults.
2. **Water Quality Monitoring Plan (Appendix N):** There are several concerns here.
 - a. **Parameters:** One of our concerns with Appendix N relates to the specified parameters that will be sampled. The current proposal identifies sampling a few physical parameters and fecal coliform. We support WSU Extension Bob Simmons' recommendations for monitoring other potential contaminants that might increase as a result of day-to-day operations of the proposed development. His recommendation includes, at minimum:
 - i. Metals: copper, lead, and zinc
 - ii. Polycyclic aromatic hydrocarbons (PAHs)
 - iii. Petroleum hydrocarbons (diesel range fractions)
 - iv. Pesticides:
 1. Insecticides: Organophosphates (Diazinon)
 2. Herbicides: (2,4-D, MCP, Triclopyr, Dichlobenil, Pentachlorophenol)

The MRC also recommends monitoring for nutrients such as phosphorus and nitrogen, at least on a periodic basis.

- b. Sampling Locations: Identified sampling locations include monitoring wells and within Pleasant Harbor. At minimum, stormwater should also be monitored at the outfall locations (and/or proposed infiltration areas) during rain events on a regular basis (at least quarterly). If at any future point the proponent decides to establish any surface stormwater discharges to marine waters, the MRC supports WSU Extension’s recommendation for preconstruction and regular (but less frequent) monitoring of sediments at the outfall location(s) using the parameters identified in the table provided in their letter.
- c. Sanitary Surveys: We also stress the need for a vigorous program of regular Operation and Maintenance (O&M) Inspections that meet WDOH requirements.

3. Groundwater Monitoring:

- a. (Current Agreement Language): *“Developer shall sample groundwater for primary and secondary contaminants list in Table 1 of WAC 173-200-040.” ... “Sampling frequency shall be reduced to annually if there are not exceedances of applicable groundwater standards for a period of five years.”*

It is unclear when the clock starts for the five years of monitoring groundwater. We advise that monitoring requirements be changed to 5 years from full build-out to properly capture any impacts that this development has on the aquifer.

In addition, we advise that well water levels be monitored quarterly in perpetuity so that impacts on the quantity of water in the aquifer are understood with enough time to take remedial action to protect the resource and avoid impacting neighboring water supplies. Falling water levels in wells may be an early sign of saltwater intrusion into the aquifer.

- b. (Current Agreement Language): *“The monitoring plan shall be funded by a yearly reserve, paid for by Statesman that will include regular offsite sampling of pollution, discharge, and/or contaminant loading, in addition to any onsite monitoring program.”*

We recommend that this language also specifies any future developer or property manager, not just Statesman. In addition, what are the offsite locations being referred to?

4. Wastewater Treatment:

- a. Appendix I– Wastewater Treatment Plan PLACEHOLDER refers to “pages 931-932 of the FSEIS, VOL 3. It was difficult to find this, and when we did, it contained just a Preamble and Executive Summary, and referenced a General Sewer Plan that we were unable to locate on the County website. The Executive Summary provided in the referenced document indicates that treated wastewater would be stored in Kettle B for fire suppression, irrigation, etc.
- b. The Agreement and associated documents provide conflicting information about the role of the kettles for managing water and run-off. The proposal identifies use of the kettles (or one kettle) for stormwater infiltration and also for storing wastewater by lining the kettles to hold water for landscape uses and firefighting. The proposed Agreement is also unclear/undecided about kettles B and C. By what mechanisms can a kettle both store

water and recharge aquifers while providing that it will also treat stormwater runoff? Also, if kettles are to be used to infiltrate stormwater, the incoming stormwater should be treated prior to infiltration into the native soils. This could occur in-situ utilizing bio-retention strategies or other treatment methods prior to discharging into the kettle.

5. The MRC supports the Planning Commission's recommendations to carefully consider and require a thorough independent review of the hydrologic function and relationship between surface water, groundwater and runoff and the sensitivity of this particular aquifer as a sole-source (or near sole-source) aquifer for the residents of Black Point and as significant aquifer recharge area. Seeps along the shoreline indicate there may also be direct connections to the marine environment.
6. **Submitted Monitoring Reports:** We suggest that documents include specifically who receives the monitoring data or reports. This may be more appropriate as part of the permitting process.
7. **Contingency Plan:** There should be a contingency plan if monitoring results exceed State standards, including mitigation actions and possibly bonding to ensure that shellfish beds and the aquifer are protected.

Sincerely,



Jackie Gardner, MRC Co-Chair

Approved by vote of MRC on April 2, 2018