From: Orsini Stephen
To: PDS comments
Subject: Replacement Guemes Ferry Proposal
Date: Friday, February 9, 2018 3:29:43 PM

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1. The replacement ferry (new ferry) proposed for Guemes Island is designed to hold 32 cars, a 45% increase in vehicular capacity from the current 22 car *Guemes*. This new ferry then represents a major expansion of vehicular traffic into a rural area (with Critical Area designation), an act discouraged under the State of Washington Growth Management Act.

2. The expansion of car carrying capacity, based on past larger ferry introductions (most recently 1978), spurred a long term growth increase in development of dwellings and commercial activities on the island. These new dwellings and commerces resulted in more exempt wells being drilled which have the license under the 1945 Exempt Well Act to extract up to 5000 gallons per day each from the island's Sole Source Aquifer(s).

3. The island, especially on the north and west sides, suffers from extensive seawater intrusion. More than 10 wells have failed in these area including the two wells serving the Potlatch II development with some 30 hookups. This Potlatch failure resulted in the installation of an expensive seawater reverse osmosis plant that is now administered by Skagit County PUD. The convoluted series of County codes relative to Seawater Intrusion in a Critical Area only address a new well after it has been drilled. They do not look at the impact of a new well on adjacent wells. The Skagit County Codes do not attempt to calculate the cumulative impact of new wells on the carrying capacity of the aquifer. The total volume of recharge water into the aquifers has not been studied.

4. The County in an attempt to provide a solution to the fresh water problems on the island offers rain water catchment as a solution. Skagit County Code currently says that alternative systems (including rainwater collection) are discouraged, and will only be approved when the applicant shows why a public water system or drilled well cannot be utilized.(SCC 12.48.50) This means that the applicant would need to drill a well first and come up dry/contaminated before being considered for a rainwater system.

5. "As stated in the Subarea Plan on page 87-88:

> The 2000 Countywide Planning Polices (CPP) and its 2006 update are somewhat consistent in calling for consideration of several major factors in making decisions about extending transportation facilities and services. They include the GMA mandates calling for cost effectiveness and limiting facility/service extensions to Rural Areas. The 2000 Comprehensive Plan included a specific policy calling for the Skagit County Regional Transportation Planning Organization to develop LOS ferry standards for the Guemes ferry (CPP 9A-8.7). However that policy was not carried forward into the 2006 update of this plan. Both versions of the plan, however, identify specific policies for expanding ferry service (CPP 9.A-8.2, draft update 8A-5.2). It appears that the intent of these policies is to implement each in a stepwise fashion and evaluate their effectiveness over time before implementing the next. In order of priority, these steps are: 1)encouraging walk-ons and car-pooling, 2) increasing the frequency of runs, and 3) increasing ferry capacity and finally, 4) extending ferry hours.

The Plan goes on to state: 'In addition to seeking cost-effective ferry service, the goal of these

policies is based on the GMA premise that the extension of public services and facilities to Rural Areas like Guemes Island will not induce growth or adversely affect rural resources or rural character.'

We also recommend coordination between the ferry system and local transit on both the Island and in Anacortes to help alleviate these problems and costs to the taxpayer." *Futurewise* letter to Skagit County Planning Commission, August 8, 2010

In summary, the scale of impact of the increased traffic and growth posed by the new ferry mandates an Environmental Impact Study. A SEPA review of the new ferry that concludes in a determination of non-significance relative to the new ferry's impacts on Guemes Island will be unacceptable.

Thank you,

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