

83505 South Cove Way
Dunes City, OR 97439
March 2, 2006

City Council
Dunes City
82877 Spruce Street
P.O. Box 97
Westlake, OR 97493

RE: Woahink and Siltcoos Lake Water Quality Fact Finding Hearing

Dear Mayor Meyer and Councilors

Woahink and Tenmile Lakes are the only Oregon lakes listed in Section 314(d) of the Federal Water Pollution Control Act, Public Law 106-457, the Estuaries and Clean Water Act of 2000. While federal funding did not accompany this recognition, the listing demonstrates concern over the water quality of Woahink Lake.

The Coastal lakes Watershed Analysis of 1999, conducted by a team from the Mapleton Ranger District and Oregon Dunes National Recreation Area, provides a more specific warning:

“If nutrient levels continue to increase relatively unchecked by State or County officials, problems such as those in Tenmile Lake south of this watershed will begin to take place.” [Page 48]

The Tenmile Lakes had a toxic algae bloom in 1997 resulting in the lake's closure by the Oregon Department of Environmental Quality, wrote Lauri Aunan, Assistant to the Director of DEQ, in her April 4, 2001 memorandum to Senator Ken Messerle.

The Department of Environmental Quality's Source Water Assessment Report for the Alderwood development Company, dated September 11, 2001 (PWS # 4100304), depicts Woahink Lake's watershed / sub-basin, as a drinking water protection area as does the “Dunes City Drinking Water Source Assessment and Potential Planning Strategies” of December 2002, prepared by Lane Council of Governments. Both of these documents describe potential risks to the City's water supply and encourage the development of a voluntary drinking water protection plan.

All of the City's water users including those holding water right certificates from the Oregon Water Resources Department and new water users are dependent on this City's actions.

Last December, Dunes City's 1968 water right permit was amended, adding 217 points of diversion for users without water rights, including Alderwood, one of several water systems supervised by DEQ's drinking water program. Also in late 2005, the Council approved 2 subdivisions and one PUD for a total of 34 lots, and accepted applications comprising an additional 64 lots.

Without a buildout analysis and other data, the human-caused impacts on water quality can not be predicted. However, please consider these two questions:

- When will the assimilation capacity of the watershed be reached?
- How soon will impairment of the lake's water quality trigger TMDLs ("Total Maximum Daily Load") such that under Section 303(d) of the Clean Water Act, the federal and state regulatory agencies will become involved?

The insurance of water quality is a complex and vital concern. I applaud this Council's careful consideration of the issues.

Respectfully,



John Stead