

12877 Manzanita Road
Bainbridge Island
Washington 98110

RECEIVED

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KITSAP COUNTY DEPT OF
COMMUNITY DEVELOPMENT

Jim Bolger
Kitsap County
Natural Resources Program
717 Sidney
Port Orchard, WA 98366

Re: Critical Aquifer Recharge Planning

Dear Jim:

I'm not qualified to comment professionally on such things as Puget Lowland stratigraphy, aquifer status, and the like. I do have a few remarks on Olympian guidance, King County's BAS, and the current Kitsap CAO.

DOE Guidance Document

First off, I'm not sure where DOE fits into this picture. My copy of GMA is 2 years old. It says, at RCW 36.70A.050 "...the department shall adopt guidelines...to guide the classification of...critical areas." "Department" means the department of community, trade, and economic development' (36.70A.030). That department is required to "consult" with DOE, but not relinquish its chore. In 2003 amendments the legislature said, "...critical areas outside the jurisdiction of the shoreline management act shall be governed by the growth management act" (Engrossed Substitute House Bill 1933, 58th Legislature 2003 Regular Session, Chapter 321, Laws of 2003, effective 7/27/03, Sec. 1). I'm no lawyer and apparently I've missed something.

In any case, the guidance seems to have some weak points. Most important is that it lays no groundwork and offers no real leadership. It is a regulatory document prepared to guide regulatory documents, not establish a vision nor build a plan. In fact there's no problem statement, no objective. What's broke isn't mentioned. How much better we can make things isn't discussed.

What is discussed are some "requirements that are in conformance with Washington State's antidegradation policy" (p. 3). If degradation is the problem, there are no numbers suggesting its size. And there are no alternatives, despite the myriad ways that water quality can be maintained and even improved. No suggestion that best chances be compared, and cost-effective ways be advanced. There is heavy emphasis on activity prohibition (p. 10), none on working out ways to make such activities feasible or even attractive.

For instance, the author takes a swipe (p. 11) at impermeable surfaces, yet the King County BAS points out correctly that in some

circumstance such surfaces are preferable (mentioned again later).

Some particulars: I don't know where the 1 system per 1 acre guide (p. 13) for septic systems came from. That's a marvelous simplistic rule that ignores the sophisticated work done by DOH and also ignores the vast diversity of on-site conditions around the state.

Taken literally, item e on p. 2 says that, relative to volume of recharge, quality ranks zero in any case where there is a tradeoff.

I would beware the susceptibility classification system of Appendix 2. A four-variable system, no matter how carefully weighted, is likely to fail when applied across the state. Regression analysis using those variables and actual measured infiltration data (or whatever 'susceptibility' actually means in quantitative terms) will surely show low structural and predictive strength. However I haven't read the pubs. Maybe the author didn't either: the Fetter pub cited on p. 30 isn't among the lit cits. Nor does he cite a 1994 critique of the method. His 4-parameter system should be compared with the 7-parameter system suggested by King County, and both should be scrutinized against the underlying data. Also read the Freeze & Cherry citation, common to both papers.

The paragraph on definitions (p. 5) seems to invite use of jargon in local plans "to ensure continuity between adopted ordinances and related [statutes]". Yet state statutes use various definitions, such as the meaning of 'department'! The appended definitions include a number unused in the guides, and the guides use words and acronyms that don't appear in the defs. 'Vadose', 'matrix', and 'critical' for instance. Still others are defined for readers in the text but don't appear in the definitions list, such as reclaimed, AKART, CARA, and LUST. If technical people can't express themselves to a general audience about water without invoking forty fancy terms, we're in bad trouble.

A minor sloppiness is in Appendix 3, where units aren't shown for precip and potential evap. Nor the number of years on which they are based. More serious here is that the numbers shown, apparently intended to be representative, are inappropriate for subareas of counties such as ours. I don't have the isopleths at hand, but I'll bet there's at least a 10-inch rainfall difference among areas of Kitsap County.

The classes of injection wells are not defined (p. 9), nor is a reference given other than a WAC.

On p. 16 is a statement that field visits should be minimized and earlier, that certain reports will not require further site evaluation. Hubris, man.

King County BAS

I enjoyed reading this one, though there may be a simpler definition for aquifer recharge areas (sec 2.1 on p. 1).