

Four Horsemen Brewery

Please indicate main role.

Citizen

Do you work in Eastern or Western Washington?

Both

Is your work primarily in an urban or a rural area?

Rural

Are you interested in the guidance from a:

County Perspective (county name)

King County mainly

How familiar are you with the groundwater protection requirements of the Growth Management Act?

Very Familiar

Does your county or city employ a hydrogeologist or other groundwater professional?

Yes

Does your county or city map Critical Aquifer Recharge Areas?

Yes

Please share any concerns or opinions about the Guidance revision - What would you like to see changed or added? To provide more detailed answers, please use this excel [spreadsheet](#).

Your Excel file is restricted and hard to use. It won't let you save it as a different file name. This online form won't allow the upload of the excel file provided. If you get no responses or input other than mine you now know why.

Question	Answer
<p>Have you encountered issues complying with the Growth Management Act for Critical Aquifer Recharge Areas? If yes, what would you consider the top three to be?</p>	<p>1. Local county codes do not have acceptable surface materials listed as pervious and exempt from permitting for new or new plus replaced surfaces. Counties should not be allowed to word codes in a manner that require critical area reviews for any change of use or for using your property for economic vitality. Counties are using the GMA as a trigger for permits without being required to have rules set for how they are allowed to make requirements, or what must be exempt because of how long it has existed and not data shows any change to aquifer recharge or contamination, which if true would necessitate monitoring. Currently if an existing driveway is even raked or smoothed out, the county claims that is a change of surface material, and thus requires a permit for surface water management (SWM FEE). 2. There are no exemptions for land uses and parking areas to be exempt from contaminants of customer vehicles for home businesses when local county roads do not have sewer drainage systems or processing facilities for vehicle contaminants currently allowed on roads. 3. There is no square footage minimum table for pervious surfaces compared to impervious surface calculations. Ex. Does a 1500sqft impervious surface need 1500sqft of natural vegetation to constitute full infiltration? Does it need 1500 sqft of natural vegetation located on the lower elevation from impervious surfaces.</p>
<p>What are the challenges your jurisdiction faces for including Best Available Science for designating and protecting Critical Aquifer Recharge Areas. What would help?</p>	<p>Counties do not provide what aquifer levels are, and there is no bench mark for what they should be maintained at. King county uses the GMA to trigger permits for the counties revenues and has no limits on what they can require. The amount of rainfall in western Washington far exceeds the eastern side of the state, where wells and water use is very limited and completely dependent on the the aquifer levels and it's recharge. Adjustments should be based on average rainfall, soil type, and if impervious surfaces allowance should be adjusted to the soil types surrounding the surface. No chart exists for minimum infiltration rates needed and what soil types exceed that, and should not require permitting for X(sqft) amount of impervious surface per X(sqft) of surrounding soil types.</p>
<p>How could the guidance help with the review and approval process?</p>	<p>Guidance is not helpful when permitting staff does not offer guidance, but only offers enforcement and overcharging for permits. A county can claim that once a property has above 5,000 (sqft) of impervious surface, it will always require a permit for any addition, even when no evidence shows aquifer recharge rates being affected. It would be helpful if properties and structures with approved BMP's, could be considered pervious because they have the flow control needed to make them pervious. Staff is trained to always use the GMA and surface water management as a trigger for permitting for staff and county revenues.</p>

<p>Does your jurisdiction map Critical Aquifer Recharge Areas? If not, what does your jurisdiction need to map them?</p>	<p>Yes, it does have pretty colors to show the CARA, but this is not actually based on surrounding properties with wells needing aquifer water and does not adjust to parcels having city water lines, and no buffers are made around existing wells that depend on surface water BMP's. It is just an overdrawn boundary to require permits for an overpermitting scheme.</p>
<p>What data resources would be helpful to you?</p>	<p>It would be helpful to have data on impervious surface (types and depth) on the quality of aquifer recharge rates and contamination levels based on soil types.</p>
<p>How does your jurisdiction address groundwater protection beyond building permits?</p>	<p>It requires permits for ANY SURFACE change, considers Grassed Modular Grid Pavement impervious, and even requires a permit for me to maintain my driveway when grading it sustainably for 30 years. It words it's code in a way that mowing my lawn can be considered a surface material change retarding water infultration rates if over 2,000 sqft and requires a permit.</p>
<p>What are the challenges you see with respect to implementation?</p>	<p>The county codes are designed as a means to overcharge citizens for permits. It needs to be changed to allow citizens to construct with due dilligence and awareness of infiltration rates for projects or changes of use or property use to allow maintaining your property and lessen the overcharging for permits. It should instead offer the BMP's as a guide for citizens to use for projects less than the max impervious surface allowed on a parcel, and permitting staff could be paid permitting fees for people who want guidance and lack experience with such control measures.</p>
<p>What would you like to see addressed in the guidance revision with respect to implementation?</p>	<p>Guidance should be given for projects that change a soil topography with more than 3' and affect infiltration rates while giving materials exempt from needing Clearing and grading permits for Surface Water Management. Her is a recent result from the hearing examiner of king county. 23. Source - (https://www.kingcounty.gov/~media/independent/hearing-examiner/documents/case-digest/appeals/code-enforcement/2018/2018%20august/ENFR170114Supp_Butler.ashx?la=en) Thus, anyone who works any ground or vegetation in King County, in almost any manner, would presumptively have “cleared” or “graded.” Each person who mows the lawn in the summer, prunes back the hedges in the fall, or adds some gravel to fill in a walkway’s wet low spots in the winter, would have the burden to affirmatively demonstrate a narrowly-interpreted exemption to the requirement to obtain a permit.</p>

If your jurisdiction has a well or a well protection area in another jurisdiction, what has been your experience with dealing with challenges and solutions for the associated Critical Aquifer Recharge Area protection?

Code enforcement officers use the code to burden responsible home owners and require them to get permits for anything you do on your property. Codes are written in a way that the change of use for a property would not have a path to compliance because a county can word it's codes in a way that restricts any activity on a property without a minimum amount of exemptions they must offer in design of their policies. If the county does not have surface water management on it's county roads, citizens should be exempt from surface water management on their properties.

Please describe how your groundwater protection efforts are funded. If you do not have sufficient funding, please feel free to state what your funding needs are in order to meet the requirements of the Growth Management Act for Critical Aquifer Recharge Areas.

I am a small business trying to gain economic vitality in the rural area. I am a school teacher and am actively working with hundreds of businesses that are affected by the county successfully "Complying" with the state GMA, but ignoring state laws regarding small business, rural economies, and increasing the economic vitality of rural area. We are not paid, but only affect with the closure of our businesses from permitting staff.

When developing, or amending, long range plans does your jurisdiction consider the long term availability or protection of groundwater?

The left cell is restricted so I wrote in this one. It thinks about groundwater, but does not have the education level to make proper decisions and the state does not require codes and implementation be designed in a manner to limit how much a county can burden it's citizens with permitting fees. It is designed instead as a tool to force citizens comply with codes or have their property be taken forcefully or liens put on property for work done for disadvantaged people and fines assed without limits.

Anything you would like to say about long range plans for the long term availability or protection of groundwater?

Ground water protection is important and people exist who will not think about the environment with regards to their business practices. People should have an exemption from needing permits when they agree to maintain and use a property using the best management practices as guides for property maintenance and home ownership.

Please share any other concerns or opinions about the Guidance revision – What would you like to see changed or added?

Guidance should be offered for citizens without farming experience, or college degrees. It should also be offered to citizens with disabilities. It should not be required without government having requirements for it's roads and practices first.