

Pierce County Planning and Public Works

Ecology should be more consistent in how they categorize the type of water uses that planning units are tasked with addressing. The policy interpretation alternates between new wells, new uses, new withdrawals, etc.. The distinction is important given the large number of potential new uses resulting from connections to existing Group B water systems on permit-exempt wells. While this distinction is made in footnote 4, Ecology should consider designating a single, standard, and explicit terminology to minimize confusion. They should consistently apply the standard terminology in this (and subsequent) guidance document(s), and Ecology Staff should strive to utilize the same terminology in Streamflow Restoration-related public forums and work products. This would help reduce the potential for misinterpretation of the policy.

Examples:

-Page 1: "Plans must be developed that will identify projects to offset the potential consumptive impacts of new permit-exempt well use on instream flows over the next 20 years." (also, consider revising passive voice).

-Page 4: "domestic permit-exempt withdrawals that require a new building permit."

-Page 4: "...technical evidence that demonstrates a new domestic permit-exempt well will not cause impairment..."

-Page 4: "Chapter 90.94 RCW supersedes existing case law and rules pertaining to the issuance of building permits and new domestic permit-exempt well water use in the 15 watersheds...."

-Page 5: "new domestic permit-exempt well water use..."

-Page 6: "consumptive use of new groundwater permit-exempt domestic withdrawals"

-Page 7: "...offset the consumptive use of new permit-exempt domestic wells that come on line during the twenty-year planning horizon..."

-Page 7: "Though the statute requires the offset of 'consumptive impacts to instream flows associated with permit-exempt domestic water use' [...], plans and plan updates should address the consumptive uses of new permit-exempt domestic withdrawals."

-Page 7: "Ecology interprets these subsections of the law [...] to relate to the consumptive water use of new permit-exempt domestic groundwater withdrawals that come on line during the twenty-year planning horizon."

-Page 9: "...plans that offset water use and anticipated effects beyond those associated with new consumptive water use initiated over the next 20 years."

-Page 10: "At minimum, the rule supporting documents will include: a WRIA-wide estimate of consumptive use from new permit-exempt wells over 20 years..."