

To: Laurie Morgan  
Water Quality Program  
Washington State Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600  
Submitted via comment portal

April 21, 2021

**RE: Comments on draft Critical Aquifer Recharge Area Guidance**

Dear Ms. Morgan,

Thank you for taking the time to consider our comment on the proposed Critical Aquifer Recharge Area (CARA) Guidance.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We work to protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Baykeeper is also a member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

First, the proposed guidance is thorough and ties together overlapping regulations like stormwater and groundwater resources. The examples of model codes from other municipalities showing how CARAs and related regulations interact is incredibly helpful.

However, one of the areas notably absent from the guidance is climate change. What guidance can the Department of Ecology provide to municipalities to prepare them for climate impacts to their aquifers? At a minimum, the Department should warn municipalities about the impacts of climate change to their aquifers in the form of 1) saltwater intrusion from rising sea levels and overuse of the aquifer (over pumping), 2) delayed recharge with changes in weather patterns, and 3) impacts to streamflows with overuse of aquifers that are hydrologically connected to certain stream reaches.

We thank the Department for strong guidance. The guidance can be even stronger by incorporating climate change impacts and possible recommendations for mitigation and adaptation.

Sincerely,

Karlee Deatherage  
Land & Water Policy Manager