

# GROUNDWATER RECHARGE TOPIC PAPER (Draft #11)

Approved by the Island County Water Resources Advisory Committee, 12/2/04  
Island County / WRIA 6 Watershed Planning Process

## Groundwater Recharge

### Introduction

The Island County Water Resource Advisory Committee (WRAC) is tasked with developing a Watershed Plan. The goal of Watershed Planning is to determine the availability of the groundwater resources in Island County and to ensure safe and adequate water supplies. Groundwater resources throughout the county are experiencing increasing demand, and in some areas are expected to be inadequate in the future. Island County's groundwater is recharged by rainfall. This paper will focus on the importance of maintaining and managing groundwater recharge, which impacts the quantity and quality of Island County's water supplies.

The recommendations identified in this paper relate to one or both of the following inter-related aspects of groundwater recharge:

1. Quantity: Maintaining adequate groundwater recharge rates through decreasing the impacts of surface modifications (e.g., hard/impervious surface area) and encouraging activities that maintain or increase recharge (e.g., Low Impact Development); note: Groundwater availability will be addressed in the WRAC's upcoming Seawater Intrusion topic paper); and
2. Contamination: Managing surface contaminants to reduce the risk of percolation down into groundwater supplies (e.g., road runoff, septic systems, agricultural nutrient and chemical applications, residential lawn chemicals). In areas with coarse-grained surficial and sub-surface geology, surface water may percolate too rapidly for adequate "filtering out" of contaminants.

### Background

#### Factors Affecting Groundwater Recharge Rates

Understanding groundwater recharge rates is an important aspect of managing the quality and quantity of Island County's water supplies. Groundwater recharge is freshwater that replenishes aquifers on an annual basis. In Island County, recharge is solely supplied by local rainfall.

Groundwater is "recharged" when rainwater percolates into the soil and down to underground aquifers. Percolation is the downward movement of rainwater through soil and stratigraphy (i.e., underground layers of sand, gravel, clay and rock). Some land areas have higher natural recharge rates than others based on surface soils, stratigraphy, precipitation and vegetation type. Underground stratigraphy in Island County is comprised of random unconsolidated materials deposited during glacial periods. Human activities (e.g., increase in

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1 impervious surface, loss of vegetation, grading) can greatly decrease rates of groundwater  
2 recharge.

3  
4 Recharge is essential for maintaining the quantity and quality of groundwater supplies. Not  
5 all recharge is available for use, however, as some portion of the recharge must remain in the  
6 aquifer system to prevent seawater intrusion.

7  
8 Natural recharge rates for Whidbey and Camano Island aquifers vary widely, due to  
9 variations in precipitation, surficial geology, soils, vegetation, etc. Recharge generally is  
10 higher in areas underlain by porous coarse-grained deposits (gravel and sand) than in areas  
11 underlain by fine-grained deposits (silt and clay), which limit water infiltration.

12  
13 A recent U.S. Geological Survey (USGS) study estimated that 20-34% of the rainwater  
14 falling on Island County is available to recharge its groundwater aquifers (“Estimating  
15 Ground-Water Recharge from Precipitation on Whidbey and Camano Islands, Island  
16 County, Washington, Water Years 1998 and 1999,” Sumioka and Bauer, USGS 03-4101,  
17 2003). Remaining precipitation runs off the surface of the land, evaporates, or percolates to  
18 the root zone and is used by plants.

19  
20 Human activities can significantly reduce recharge rates. As an area develops, natural  
21 rainwater percolation rates can be maintained/encouraged through using Low Impact  
22 Development (LID) methods such as:

- 23  
24 1. Limiting the surface area of hard/impervious paved surfaces (e.g., roads, parking  
25 lots) through use of pervious concrete, pervious pavers, “grasscrete” and similar  
26 pavement materials;
- 27  
28 2. Managing roof runoff and minimizing roof size, where possible;
- 29  
30 3. Retaining surface water runoff in cisterns or other catchments (e.g., retention  
31 ponds, infiltration ditches, grassy swales), to return water to the soil for on-site  
32 percolation; and
- 33  
34 4. Keeping native vegetation on-site and minimizing grading or soil compaction.

35  
36 These LID methods can mitigate the effects of hard/impervious surfaces, allowing retained  
37 or collected rainwater to percolate into the ground on-site instead of running off to Puget  
38 Sound.

## 39 40 Sources of Potential Groundwater Contamination

41  
42 This topic paper will discuss and make recommendations for mitigating potential  
43 contamination from road runoff, septic systems, agricultural nutrient and chemical  
44 applications, and residential lawn chemicals. Contaminants from each of these sources can  
45 enter groundwater supplies as rainwater percolates downward and recharges aquifers.

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1 Seawater intrusion and elevated chloride levels will be discussed in the WRAC's "Seawater  
2 Intrusion" topic paper. This topic paper will not discuss other groundwater supply  
3 contaminants such as arsenic, iron/manganese, bacteria, or pharmaceuticals. Pharmaceuticals  
4 may be introduced into aquifers through septic systems. This is an emerging issue that is  
5 being widely researched at the national level: the widespread effect of these manmade  
6 organic compounds on ecosystems and humans is not yet understood, but current reports  
7 indicate that neither bodily biochemistry nor standard anaerobic septic systems can  
8 adequately breakdown these materials. The Island County Board of Health may want to  
9 track this emerging issue.

10  
11 High recharge rate areas (areas with highly pervious soils) may be at risk for contamination.  
12 Rainwater can percolate through coarse-grained deposits so rapidly that surface  
13 contaminants are not "filtered out" before water enters the aquifer.

14  
15 Shallow aquifers, "perched" aquifers, or areas with shallow soils may also be at risk for  
16 contamination. ("Perched" aquifers sit above lower aquifer levels and are kept separate by  
17 low permeability clay layers.) Where groundwater is shallow, rainwater may not move  
18 through enough sub-surface material to "filter out" contaminants before the water enters the  
19 aquifer.

20  
21 Nitrates are a contaminant of concern in areas of Island County. Nitrates are not typically  
22 present in groundwater; well sample levels should be 0 mg/L. Nitrates are normally "filtered  
23 out" within the root zone of the upper soil layers. At high levels all of the nitrates present  
24 may not be taken up in the root zone, and are free to migrate downwards to aquifer supplies.

25  
26 Nitrate levels of 1-3 mg/L indicate a developing problem, especially if nitrate levels are  
27 increasing over time (i.e., increasing trend shows that there is a current land use that is  
28 contaminating the groundwater supply). At nitrate levels of 5 mg/L, an action level is  
29 triggered and public water system regulations require that monitoring be increased. The  
30 maximum contaminant level (MCL) for nitrate levels is 10 mg/L. While public water systems  
31 are required to monitor nitrate levels periodically, many private domestic wells in Island  
32 County have never been tested for nitrates. Prior to 1990, there were no sampling  
33 requirements for individual wells. Since 1990, in response to Growth Management Act  
34 requirements, all individual wells must be tested for nitrate prior to building permit approval.

35  
36 Drinking water with nitrate levels exceeding the 10 mg/L maximum contaminant level  
37 (MCL) may be hazardous for human consumption, especially for pregnant women (i.e.,  
38 developing fetuses) and children under one year of age. Once ingested, nitrate is converted  
39 to nitrite in the stomach. The nitrite then reacts with blood hemoglobin to form  
40 methemoglobin. As a result, the capacity of the blood to carry oxygen is reduced and  
41 systems of oxygen starvation begin to occur: this condition is known as methemoglobinemia  
42 or Blue Baby Syndrome.

43  
44 Nitrates will be focused on in this topic paper because the presence of nitrates indicates that  
45 other contaminants may be present in the future also, and because treatment of nitrates  
46 helps mitigate other potential contaminants. Other potential contaminants can include

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1 ammonia, total dissolved solids, nitrites, chloride, iron, lead, manganese, mercury, and fecal  
2 coliform bacteria.

3  
4 A 1997 study conducted by the Island County Health Department (ICHHD) identified nitrate  
5 sources and their extent, and recommended strategies for preventing further contamination.  
6 Human activities were found to directly or indirectly cause elevated nitrate concentrations.  
7 Although agricultural practices were found to be the largest contributors, densely developed  
8 residential areas using on-site wastewater treatment systems may contribute higher  
9 contaminant loads than agricultural practices. Well depth is also identified as a causal factor  
10 for nitrate contamination: “The findings of [the ICHHD] study suggested a correlation  
11 between shallow aquifer depths and vulnerability to nitrate contamination... This  
12 observation is consistent with the findings of numerous other studies throughout the U.S....  
13 These findings support the widely held theories that groundwater nitrates originate at the  
14 land surface, and that aquifers are protected from pollutants by the presence of overlying  
15 layers of semi-permeable deposits ” (page 27, “Island County Groundwater Nitrate Study,”  
16 Robert Hallbauer, ICHD, 1997).

17  
18 Elevated nitrate levels are already observed within high susceptibility areas. Table 1 shows  
19 the current total nitrate levels in wells within Critical Aquifer Recharge Area (CARA) areas  
20 of “limited,” “moderate,” and “high” susceptibility. Table 1 was developed in order to  
21 validate the computer model that delineated the “limited,” “moderate,” and “high”  
22 susceptibility areas. This data shows that total nitrate levels are higher in areas of “high”  
23 susceptibility than in “limited” or “moderate” susceptibility areas.

	CARA Susceptibility		
	Limited	Moderate	High
Total Area (Square Miles)	38	141	32
Area (% of Total)	18%	67%	15%
Number of Wells with NO <sub>3</sub> data	469	2064	568
Average NO <sub>3</sub> (mg/L)	0.81	1.01	1.35
Percent of Wells where MaxNO <sub>3</sub> > 1 mg/L	18%	27%	36%
Percent of Wells where MaxNO <sub>3</sub> > 5 mg/L	3.6%	5.4%	9.7%
Percent of Wells where MaxNO <sub>3</sub> > 10 mg/L	0.9%	1.0%	2.3%

34  
35  
36 Table 1. Critical Aquifer Recharge Area (CARA) Data from the Island County  
37 Hydrogeology Database. (Note: Nitrate levels of 5mg/L trigger additional  
38 monitoring actions; the Maximum Contaminant Level (MCL) for nitrate levels is 10mg/L.)  
39

40 Source protection is the most prudent approach to prevent contamination, particularly in  
41 areas where surface water may percolate too rapidly for adequate “filtering out” of  
42 contaminants (i.e. areas with coarse-grained sub-surface geology). Source protection could  
43 include the following strategies as related to groundwater recharge:

- 44  
45 | 1. Design standards for on-site wastewater treatment systems, to ensure adequate  
46 | treatment and disposal of domestic wastewater;  
47

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2. Best management practices (BMPs) for agricultural nutrient and chemical applications, to protect aquifers from concentrated sources of contamination;
3. Siting appropriate land uses in areas with susceptible sub-surface geology; and
4. Retention of nonpoint pollution sources (road and lawn chemical contaminants carried by surface water runoff), particularly in areas with susceptible sub-surface geology. LID practices retain water runoff on a site so that any contaminants can be treated in the soil root zone.

## Existing Policy Tools

The following policy tools protect groundwater supplies through maintaining adequate groundwater recharge rates and managing surface contaminants in susceptible aquifer recharge areas.

### US-EPA Sole Source Aquifer Status

In 1982 the U.S. Environmental Protection Agency (US-EPA) designated Island County with “Sole Source Aquifer” status. This status is a legal designation, not a physical description. “Sole Source Aquifer” status can be granted when more than 50% of the county population relies on an aquifer system as their principal source of drinking water, and when contamination of the source would create a significant hazard to public health. The Board of Island County Commissioners’ petition to the EPA in April 1981 was based on the aquifers’ vulnerability to contamination from industrial sources, subsurface sewage disposal, and seawater intrusion (1992 Island County Groundwater Management Program, page I-1).

The designation as “Sole Source Aquifer” publicizes groundwater value and provides limited federal groundwater quality protection. Once the EPA designates an aquifer through a public process, it has the authority to apply additional review prior to approval of federally funded projects that may potentially contaminate the “Sole Source Aquifer.” Examples of federally funded projects that the EPA reviews include transportation, agriculture, and construction: projects that may impact groundwater quality. This does not mean that projects cannot go forward in a sole source aquifer area, but rather that the project needs to take special measures to minimize the risk of contaminating the aquifer. (EPA website, <http://yosemite.epa.gov/R10/WATER.NSF>)

Congress first established the Sole Source Aquifer Protection Program in 1974 under Section 1424(e) of the Safe Drinking Water Act and reauthorized the program under the August 1996 SDWA Amendments.

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## Critical Aquifer Recharge Area (CARA) Protection

Island County currently has tools and policies in place to address groundwater recharge through land use protections. “Areas with a critical recharging effect on aquifers used for potable water, also referred to herein as aquifer recharge areas, are regulated pursuant to Potable Water and Supply, Chapter 8.09 IC Code, and the Land Development Standards, Chapter 11.01 IC Code” (IC Zoning Ordinance 17.02.107). Any changes to IC Code 8.09 are approved by the Island County Board of Health.

Critical Aquifer Recharge Area (CARA) protection is part of Island County’s Critical Areas Ordinance. “A hydrogeologic site evaluation shall be required prior to preliminary project approval of projects identified...as having the potential for groundwater contamination and where best management practices will not adequately prevent groundwater contamination” (IC Code 8.09.097, Critical Recharge Area Protection, 1992). “Hydrogeologic evaluations are required prior to preliminary approval of projects identified by the (Island County) Health Officer as having a potential for groundwater contamination. Appropriate mitigation measures are imposed as conditions of approval for projects with a potential for impacts to groundwater resources” (page 2-13, Water Resources Element, IC Comprehensive Plan, 1998).

The purpose of Critical Aquifer Recharge Areas (CARA) protection is to protect groundwater in areas susceptible to surface contamination, through the process of groundwater recharge. CARA protection is currently a mechanism to review proposed projects that could have negative impacts on the groundwater resource (e.g., car washes, gas stations, underground storage tanks). CARA regulations include appropriate prevention, best management practices, and mitigation actions.

The Land Use Element of the 1998 IC Comprehensive Plan designates all of Island County as a CARA (page 1-108, Land Use Element). The Water Resources Element of the 1998 IC Comprehensive Plan states the following (pages 2-12, 2-13):

“The Growth Management Act (GMA) requires the designation and protection of critical areas, such as aquifer recharge areas... All of Island County is...considered a recharge area and specific protection measures are determined at the time of application and relate to project impacts... This approach is more stringent than only applying protection measures in certain areas... Due to the complexity of the aquifer systems underlying Island County, it is difficult, if not impossible, to apply regional determinations of groundwater resource protection and water availability. Given these management limitations, site-specific and project specific evaluations are the best available option. As additional information is collected and analyzed, refinements can be made to the systems of identifying critical areas for recharge and groundwater protection.”

IC Code 8.09 contains implementation activities for protecting Critical Aquifer Recharge Areas (CARA). Under IC Code 8.09, development permit applications are evaluated by the ICHD for CARA review and protection activities.

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1 The following activities trigger CARA review and protection activities (IC Code 8.09),  
2 specifically hydrogeologic site evaluation to determine aquifer vulnerability:  
3

- 4 1. Any land use that involves storage, use, handling or production of hazardous  
5 substances or waste products;  
6
- 7 2. Petroleum transmission facilities and/or petroleum storage tanks;  
8
- 9 3. Certain land and subsurface sewage disposal systems (e.g., off-site drainfields,  
10 systems serving more than two residential housing units, systems serving  
11 commercial and industrial projects, systems with design flows or more than 3,500  
12 gallons per day); and  
13
- 14 4. Surface mining operations requiring a permit from the State DNR.  
15

16 The Critical Areas Ordinance is included within the Island County Comprehensive Plan, and  
17 will be updated by December 1, 2005. The Island County Planning Department will be  
18 responsible for recommending updates to the Critical Areas Ordinance.  
19

20 Existing CARA maps are based on older, more limited information including only surficial  
21 geology (soils). Existing protection reviews or guidelines may be adequate, too restrictive, or  
22 not protective enough for quantity or contamination concerns. The WRAC and ICHD staff  
23 will use current hydrologic data to assist the Planning Department in revisiting CARA  
24 designations and protections.  
25

## 26 Nonpoint Pollution Prevention Plans 27

28 Island County currently has recommended actions in its Nonpoint Pollution Prevention  
29 Plans that would protect and maintain groundwater supplies.  
30

31 The Puget Sound Nonpoint Pollution Prevention Plan (RCW 90.71) planning activities are  
32 outlined in WAC 400-12: “reduce pollutant loading from nonpoint sources, prevent new  
33 sources from being created, enhance water quality, and protect beneficial uses.” Nonpoint  
34 Pollution Prevention planning activities include water quality monitoring, nonpoint pollution  
35 source identification, and nonpoint pollution prevention recommendations.  
36

37 Under WAC 400-12, Island County began its watershed ranking process in 1988. The North  
38 Whidbey Nonpoint Prevention Plan was approved in 1997, and highlighted construction  
39 BMP (best management practices) and educational (pet waste and realtor workshops)  
40 recommendations. The Central/South Whidbey Nonpoint Prevention Plan was approved in  
41 2003 and highlighted water quality (pet waste and septic) recommendations. The Island  
42 County Implementation Actions Grant is ongoing (2000-2005), as is the Camano Nonpoint  
43 Pollution Prevention planning process (2002-2006).  
44

45 Both of the North and Central/South Whidbey Nonpoint Pollution Prevention Plans  
46 describe “comprehensive sub-basin planning and analysis” recommendations that could

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1 greatly benefit groundwater recharge protection efforts. Sub-basin planning would include a  
2 comprehensive assessment of land use, hydrogeology, soils, percolation rates, geology, slope  
3 stability, and erosion. Focusing on the sub-basin scale allows making specific and effective  
4 recommendations.

5  
6 Island County's Critical Aquifer Recharge Area (CARA) guidelines could be used to  
7 prioritize sub-basin planning efforts. Highest priorities would be areas where there appears  
8 to be nonpoint pollution that could be dealt with through existing CARA regulations. High  
9 value aquifer recharge areas should be considered when prioritizing sub-basins (i.e., not just  
10 surface water streams and wetlands).

## 11 12 13 **Options**

14  
15 The WRAC recommends that Island County implement the following options.  
16 Implementation of these options is vital for the management of the quality and quantity of  
17 Island County's water supplies.

### 18 19 Option #1

20  
21 The WRAC recommends the use of the newly developed "Combined CARA Scoring" map  
22 as a tool to show "limited," "moderate" and "high" susceptibility areas (i.e., areas susceptible  
23 to surface contamination through the process of groundwater recharge). Appendix 1  
24 contains the "Combined CARA Scoring" map.

25  
26 The "Combined CARA Scoring" map was developed by the WRAC and ICHD staff as an  
27 update to Island County's Critical Aquifer Recharge Area (CARA) map. "Limited,"  
28 "moderate" and "high" susceptibility areas have been delineated using the DOE "Guidance  
29 Document for the Establishment of CARA Ordinances" (2000) as well as "Best Available  
30 Science" developed through the county's hydrogeology database. Use of the DOE Guidance  
31 Document raises the confidence level of the final scores for the CARA map.

32  
33 The following four criteria were used to assess aquifer vulnerability, and maps of each  
34 parameter were developed (see Appendix 1, "Derivation of the CARA Susceptibility Map,"  
35 for maps and a further description of how each was developed):

- 36  
37  
38  
39  
40  
41  
42  
43  
44
1. Depth-to-Water parameter was used to develop the "Depth to Water Susceptibility Rating" map, using data from the Island County hydrogeology database;
  2. Recharge parameter was used to develop the "Groundwater Recharge Rate" map, using information from the USGS Deep Percolation Model and DOE Scoring Options;

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3. Soil Permeability parameter was used to develop the “Soil Percolation Rate” map, using information from the Island County Soil Survey; and
4. Surficial Geology parameter was used to develop the “Surficial Geology Susceptibility Rating” map, using data from the Island County hydrogeology database.

The “Combined CARA Scoring” map shows the sum of the scores from the four individual maps and ranks the county into one of three zones: “limited,” “moderate,” and “high” risk for contamination. This new CARA map will be a useful tool for assessing aquifer vulnerability to contamination, and would accomplish the following:

1. Give real meaning to the level of protection for highly susceptible areas;
2. Remove some areas from unneeded extra protection and review; and
3. Provide information of additional requirements at the beginning of the permitting process.

The process of review and required performance standards could be publicized, allowing applicants to either follow county regulations or pay for private engineering review. All permit applications undergo additional review by county hydrogeologist staff; formalizing this process could be helpful to applicants.

The WRAC recommends that Island County Health Department hydrogeology staff provide technical assistance to the Planning Department during future updates to the county’s Critical Area Ordinance and Comprehensive Plan.

The WRAC also recommends that the IC Planning and Health Departments should use the same map to show CARA designations. A new CARA map would be a starting point for determining whether additional site review was needed (based on IC Code 8.09 requirements); site conditions would prevail.

## Option #2

The WRAC recommends an emphasis on Low Impact Development practices (LID) that would protect groundwater supplies through maintaining groundwater recharge rates.

LID could be encouraged and emphasized in recharge areas important for maintaining groundwater quantity. LID practices can contribute to increased groundwater recharge rates (as well as treating/reducing groundwater contamination sources – see option #3).

LID practices include keeping water on-site, reducing land clearing and grading, and limiting effective hard/imperious surfaces. Island County Nonpoint Pollution Prevention plans have recommended LID practices for protection of groundwater supplies. (Note: LID

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1 practices for groundwater recharge purposes would be needed for moderately susceptible  
2 areas only, because highly pervious areas would not benefit significantly from LID practices.)  
3

## 4 Option #3

5  
6 The WRAC recommends that Island County continue to protect “high” susceptibility areas  
7 identified on the newly developed CARA map (i.e. aquifer areas susceptible to surface  
8 contamination through the process of groundwater recharge). The WRAC recommends that  
9 protective measures already in place be provided in writing to an applicant at the beginning  
10 of the permitting process.

11  
12 The WRAC recommends that Island County identify conditionally permitted activities  
13 through consulting the DOE “Guidance Document for the Establishment of CARA  
14 Ordinances” (2000) (see Table 2). The WRAC recommends that all activities should be  
15 conditionally permitted for high susceptibility areas, with the exception of “Landfills,” which  
16 are prohibited by RCW 70.95.060 based on Island County’s Sole Source Aquifer designation.  
17

### 18 **Conditionally Permitted Activities**

19 Above Ground Storage Tanks	Animal Feedlots
20 Automobile Washers	Below Ground Storage Tanks
21 Chemical Treatment Storage & Disposal	Hazardous Waste Generators
22 Injection Wells	Junk & Salvage Yards
23 Landfills*	Mining
24 Oil & Gas Drilling	Onsite Sewage Systems (>14,500gal/day)
25 Pesticide Storage & Use	Recycling Facilities
26 Sawmills	Solid Waste Handling Facilities
27 Surface Mining (including Sand & Gravel)	Underground Injection Wells
28 Waste Water Application to Land Surface	Wood Treatment Facilities

29  
30 \*Note: Landfills are prohibited in Island County by RCW 70.95.060  
31

### 32 Table 2. Guidelines for Conditionally Permitted Activities.

33 Adopted from the DOE “Guidance Document for the Establishment of CARA  
34 Ordinances” (2000), Prohibited versus Conditionally Permitted Activities.  
35

36 Island County will develop specific implementation tools for recommendations made in the  
37 Watershed Plan during “implementation” of the Island County Watershed Plan (Phase 4 of  
38 2514 Watershed Planning). At that time, the WRAC expects that the Island County Health  
39 Department could assess IC Code 8.09, and recommend changes to the Island County  
40 Board of Health.

41  
42 For road and residential contaminant sources (e.g., lawn chemicals and fertilizers),  
43 contaminants could be mitigated through encouraging Low Impact Development (LID)  
44 practices. Residential LID practices include keeping water on-site, reducing land clearing and  
45 grading, and limiting effective hard/impervious surfaces. Island County Nonpoint Pollution  
46 Prevention plans have recommended LID practices for mitigating surface water  
47 contamination. Island County is in process of adopting sections of the WA Department of

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1 Transportation Highway Runoff Manual (Flow Control and Water Quality) and the DOE  
2 Stormwater Management Manual; implemented actions will help to mitigate road runoff  
3 contamination.

4  
5 Agricultural nitrate contaminant sources could be mitigated through working with the  
6 agricultural community on a voluntary basis, to ensure that farm plans and best management  
7 practices (BMPs) are followed. The Snohomish Conservation District and the Whidbey  
8 Island Conservation District fully approve of the concepts and strategies discussed in this  
9 topic paper.

10  
11 Biosolids are an end-product of the wastewater treatment process, and are an excellent  
12 fertilizer containing organic material, nitrogen, and phosphorus. Island County could work  
13 with the regulatory agencies involved with biosolid applications to determine the most  
14 appropriate locations and timing of applications, and to closely monitor nitrate levels in  
15 susceptible groundwater recharge areas.

16  
17 The WRAC is aware of the threat of nitrate contamination from onsite sewage treatment  
18 systems. Elevated nitrate levels are already observed within high susceptibility areas, as  
19 discussed in the Background of this paper (“Sources of Potential Groundwater  
20 Contamination, pages 2-5).

21  
22 The WRAC recommends that the Island County Board of Health and the Board of Island  
23 County Commissioners be involved in the current State DOH process of setting new onsite  
24 sewage treatment rules. This recommendation in no way suggests that the WRAC holds a  
25 position on the proposed onsite rule changes.