

Anna Randall

From: Perry Huston
Sent: Monday, June 09, 2014 7:59 AM
To: Don Johnson
Cc: Anna Randall; * County Commissioners; Lalena Johns; Tanya Craig
Subject: RE: Comments on County Comprehensive Plan, Interim Zoning, and Determination of Non Significance

Thank you for the comments.

From: Don Johnson [mailto:dwjnrc@live.com]
Sent: Saturday, June 07, 2014 9:47 AM
To: Perry Huston
Subject: Comments on County Comprehensive Plan, Interim Zoning, and Determination of Non Significance

The following comments are submitted for the consideration of the County Commissioners.

Dr. Donald W. Johnson, Member of the Libby Creek Watershed Association

1. The Comprehensive Plan should clearly specify what measures will be taken to ensure adequate water supply for the density it envisions.

Overallocation of water in the Methow Valley and other drainages in the County is a pressing issue and must be addressed in the Comprehensive Plan. The Methow River's Lower reach, stretching from Beaver Creek to Pateros (basically, south of Twisp) is the most overallocated reach in the Methow River Basin. The Methow Watershed Council reminded the Commissioners in April, 2013 that **if no further subdivision occurs in this reach, a minimum of 1,092 parcels would still be without water.**

In addition the impact of such potential water use can constitute a "taking" of ESA-listed salmonids and must be considered.

2. The Plan should enumerate specific protections for groundwater resources.

The Plan fails to meet its state-mandated obligation to "protect the quality and quantity of groundwater used for public water supplies. Crucial recharge aquifers are not identified in the Plan, nor any plans for their protection. The DISTRICT USE CHART allows uses such as acid manufacturing plants, asphalt plants, and explosive manufacturing/storage to be placed over critical aquifers and Wellhead Protection Zones in all the Rural 1 acre, 5 acre, and 20 acre zonings, together with onsite septic systems. **In addition the impact of this lack of protection may threaten the survival of ESA-listed salmonids and must be considered.**

3. The Methow CPA's should be included as part of this Comprehensive Plan and should be legally defensible, up to date, and consistent with the vision of the Methow Review District zoning.

The fate of the Methow's "More Completely Planned Areas (CPA's)" remains uncertain. The fact that zoning for the two CPA's in the Methow Valley remains unchanged is an important step in the right direction; however, the governing CPA plans and policies that define a direction for these zoning codes have not been scheduled for either update nor

adoption by the county. As the basis for current and future zoning, these CPA's should be a part of this Comprehensive Plan and should be legally defensible, up to date, and not dependent upon prior adoption of the rest of the Comp Plan.

4. The Plan should provide a concrete schedule for creation of a "More Completely Planned Area (CPA)" for the Lower Methow Valley (south of Gold Creek).

The lower Methow Valley is in need of careful land use and water resource planning in order to avoid future hardship, should subdivision continue as recommended in these plans. The lower Methow is a sensitive area with fragile soils, steep slopes, and the most severe water quantity concerns in the Methow Valley. The area has experienced a large increase in subdivision in remote areas over the past decade and has been without such protective land use provisions employed in the upper Methow since 1976. In the area south of Gold Creek, zoning is almost entirely for Rural-1 (acre) minimum lot sizes, with up to 2 homes on each. This is the Methow's most productive agricultural land, yet the Plan's language is contradictory as to whether or not "agriculture" is an allowable use there. The Plan promotes suburban-sized lots and land use in this "Rural" designation. **The integrity of this river valley as a whole, from fish and wildlife connections to rural community values and water issues, should play a major part in land use planning..**

5. Contradictory elements of the Comprehensive Plan, Zoning Ordinance and supporting documents need reconciliation, and definitions provided, before adoption of these plans.

The Current draft of the Comp Plan and Zoning cannot be analyzed nor implemented as written, due to ambiguities, contradictions, and inaccuracies that require clarification. Is agriculture really going to be abolished in the Rural 1 (one acre) Zone, which includes most of the Lower Methow Valley? Ambiguities on maps which could support undesirable changes in the Methow Review District from 20 to 5- acre zoning need clarification. Densities of Rural designations(1, 5, or 20-acre) are determined by their distances from county "arterials," but the county has no arterials (only major and minor "collectors"), and there are no descriptions of how distances are measured nor any necessary definitions in the Comprehensive Plan. Substantial portions of the 1-acre (R-1) zoning are along dirt or gravel roads, leading to public lands or hayfields, and far from any major paved road or services.

6. The past, present and future role of individual citizens, advisory groups and communities in shaping the Comprehensive Plan should be recognized and respected by County officials.

The involvement of Neighborhood Groups, established by the County and proceedings funded by the State, has been ignored (I participated in one of these Groups.). The 7-year history of this Comprehensive Plan Update shows increasing limitations on citizen involvement in each successive Draft. In previous drafts, the Comp Plan contained provisions for citizens, towns, and cities to request amendment of the Plan on an annual basis. Comp Plan review was also scheduled for every 5 years. These provisions have been eliminated. Likewise, community input in 2008 by eleven different county-facilitated Neighborhood Groups was included in the first draft, then relegated to the appendix, then merely mentioned by a list of geographic group names, and finally have been eliminated altogether. The removal of community input and growth

management provisions from the current Draft Comprehensive Plan was largely carried out by special interest groups. **Involvement of citizens, towns, and cities in land use decisions in our county are crucial to effective planning.**