

Methow Valley Citizens Council



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PO Box 774
Twisp, WA 98856
www.mvcitizens.org
509 997 -0888

Okanogan County Commissioners
123 5th Avenue North, Room 150
Okanogan, Washington 98840

August 10, 2020

Re: Renewal of Interim amendments to zone map – Ordinance 2020-05

Dear Commissioners DeTro, Hover and Branch,

The Methow Valley Citizens Council (MVCC) appreciates the opportunity to comment on the renewal of interim amendments to the official zone map. The mission of MVCC is to raise a strong community voice for the protection of the Methow Valley's natural environment and rural character.

We agree that adoption of this interim measure is necessary to avoid creation of additional lots for which a determination that "adequate provisions for potable water," as required by RCW 58.17.110, cannot be made. MVCC and others have previously expressed concern that the number of existing undeveloped lots, plus potential new lots, in the Lower Methow River Reach of WRIA 48 exceeds the water in reserve for single use domestic purposes allowed by WAC 173-548, the Methow Instream Flow Rule.

Futurewise comments on this proposed ordinance point out, You might notice these numbers do not match the numbers in the proposed ordinance. That is most likely a result of the county's analysis including the zone of influence for the Columbia River, and the town expansion areas. Prior to extending this ordinance a third time or incorporating it into other planning efforts like the Comp Plan or zoning, the analysis of existing and future potential lots in light of available water should be re-run in collaboration with the Watershed Council and others so that consensus on the assumptions and conclusions is more universal going forward.

While we support the adoption of the proposed interim zoning change, we are concerned that there may still be an inadequate quantity of legally available water to support the number of anticipated new lots (2,275) in this reach. As you are aware, our view of the Methow Rule differs from current County interpretation of how the Rule restricts use of permit-exempt wells. Simply increasing the minimum lot size to 5 acres is not likely to sufficiently limit density to assure that water is legally available for all potential future development – but it's a step in the right direction.

We assume that adoption of this interim measure indicates the County's recognition that in order to comply with the requirement of legal and physical water availability to support additional building, lot density in the Lower Valley must be reduced in the new zoning code as well as in this

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interim measure. Consequently, we anticipate that the County will give serious attention in further development of the new Comprehensive Plan and zoning code to better aligning development with available water supplies.

Water availability is not the only factor that should be considered in managing future development in the lower Methow. As long ago as 2008 and 2011, the Lower Valley Advisory Group recommended to the county that densities in the lower valley be reduced both on the valley floor and in the uplands. The Advisory Group's recommendations were the result of a formal, facilitated process that included extensive community participation. The recommendations were intended to address community concerns about the impact of further subdivision on water availability, wildlife habitat (particularly mule deer and endangered fish species), rural character, and other qualities considered important by community members.

From that perspective, the time to make these changes is long overdue, and we are hopeful that the County will carefully consider the Advisory Group's recommendations when completing the Comprehensive Plan and zoning. We thank you for renewing this interim measure.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lorah Super".

Lorah Super
MVCC Program Director