

Methow Valley Citizens Council



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Mr. Thom Vedder, Town Planner
Town of Twisp
118 S. Glover Street
Twisp, WA 98856

Sent by email to: townplanner@townoftwisp.com

Re: Twisp Family Haven Planned Development

January 8, 2025

Dear Mr. Vedder,

Thank you for the opportunity to provide comments on the Town's Mitigated Determination of Nonsignificance (MDNS) for the Twisp Family Haven Planned Development proposal. The Methow Valley Citizens Council (MVCC) raises a strong community voice to protect the valley's natural environment and rural character. Through the personal lens of staff and board members' experiences, and through MVCC's participation in the Housing Solutions Network Roundtable, we are well aware of, and supportive of, efforts to address the strong need for affordable housing centered in our towns.

We recognize the valuable role that Catholic Housing Services is serving with this proposal, to meet an identified need for subsidized rentals that can provide homes to vulnerable and low-income community members. However, we believe that some site characteristics and elements of the current proposal could present significant adverse environmental impacts if not adequately mitigated. We disagree that the current MDNS provides adequate mitigation requirements to avoid, minimize or compensate for probable significant impacts. We appreciate the opportunity to share the following concerns and suggestions, based on elements in the SEPA Checklist.

Water (3 a,b,c)

We are aware that the Methow Valley Irrigation District (MVID) operates wells on or adjacent to the subject property. These MVID wells serve the irrigation of agricultural lands as well as many residential lawns and gardens. According to the Department of Ecology's Dirt Alert program, the subject property is located on ground that was occupied by an orchard during the era when lead arsenate was used as a pesticide. As a result, it is likely to have elevated levels of lead or arsenic.

According to Ecology's website: "*Arsenic and lead are toxic and can be harmful to human health. Children are especially vulnerable because they*

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are still growing, and they are more likely to accidentally swallow contaminated dirt. This type of pollution, called area-wide soil contamination, puts ... communities at risk.”

Understandably, at this early pre-purchase stage, the project proponent has only conducted limited sampling, and it has identified contamination exceeding some thresholds. Because the area is identified and mapped by Ecology as former orchard land, it is likely that contamination concerns may cover a wider area. **Measures to assess the extent of contamination, and to protect surface and ground water during and following construction, should be included in the MDNS. We strongly recommend including the Department of Ecology in this process.**

Environmental Health (7a(1)(5))

This section of the SEPA Checklist asks proponents to *Describe any known or possible contamination at the site from present or past uses, and to provide Proposed measures to reduce or control environmental health hazards, if any.* In their response, proponents note that a Limited Environmental Site Evaluation was conducted by an engineering firm on December 6, 2024. The evaluation included limited soil sampling, that resulted in detection of contaminants. However, there are no measures proposed in the SEPA Checklist to further study or mitigate the contamination. The Town of Twisp is proposing “soil mixing” as the only mitigation measure. We are led to wonder whether this is adequate, given the history of the subject property and known contamination. There is no mention in the SEPA Checklist nor the MDNS regarding consultation or technical assistance from the Department of Ecology. **We strongly recommend engaging with Ecology for more soil testing and evaluation before developing a cleanup or construction plan to minimize the chance of mobilizing and spreading contamination to adjacent lands, surface and groundwater, as well for the safety and health of future residents of the development.**

Environmental Health (7(a)(5))

This section of the SEPA Checklist concerns special emergency services that may be required. It is correctly noted that police, fire and EMS will need to access the development. As Twisp and the surrounding area are located in an area of high wildfire risk and based on the number of residents (180) the development plans to serve, **we strongly recommend that the construction design include adequate room for fire and emergency apparatus. Additionally, two routes of egress should be planned in case of emergency.** When considering where to locate additional egress, it will be necessary to evaluate and mitigate impacts to traffic flow from 384 daily trips entering and exiting the development on adjacent roadways, not just Schulz Lane. This consideration will affect section 14 (Transportation) of the SEPA Checklist.

Land and Shoreline Use (8(b)(1)(h)) Critical Areas

In this section, it is noted that the east end of the site has been categorized as having moderate potential as an aquifer recharge area, based on Twisp Critical Areas Maps. Aquifer Recharge is incredibly important for the health of the Methow River and numerous aquatic species, in addition to downstream human uses. Taking note of the above-mentioned

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contamination issues, plans for clearing and grading, and stormwater management, **it is critically important to ensure that Aquifer Recharge is not affected by contaminants from the surface.**

Land and Shoreline Use (8(b)(1)(i)) Number of Tenants

In this section, it is noted that the development is anticipated to serve 180 tenants. Elsewhere in the Checklist it is noted that there will be 72 intended units housing the tenants, resulting in a likelihood of 384 trips per day. We are aware that this development was planned with knowledge of the specific local needs for affordable housing. We also understand that people from throughout the United States will be eligible to apply for this housing. *It is important to differentiate the potential intensity of impacts to the environment and local services from adding 180 new residents, versus serving 180 existing community members in need.* **We strongly recommend that Catholic Housing Services work closely with Room One, Okanogan Community Action Council and others in the social services sector on criteria to ensure that strong preference is given to serving the local need first.**

Aesthetics (10a)

Apartment buildings for the Twisp Family Haven Planned Development are proposed to be constructed three stories high. We are not aware of any three-story buildings providing affordable housing in the Towns of Twisp or Winthrop. Limits on building height in both towns were historically intended to protect the aesthetics of our small rural towns and protect scenic views for residents and visitors. While we support increasing density in towns to support the additional growth that is planned to occur over time, we do not believe that it is necessary or appropriate at this time to begin building “up” to accommodate density. Going up to three stories here will set a strong precedent that other developments are likely to follow, drastically changing the appearance and character of the Town of Twisp and putting pressure on Winthrop to do the same. **We recommend that any decisions about increasing building heights in the Town of Twisp be part of a larger community process about the vision and plan for Twisp to inform changes to Zoning, rather than make that decision solely as the outcome of a single, albeit important, development proposal.**

Light and Glare (11)

In this section, the proponent indicates appropriate lighting will be provided for buildings and parking lots but provides no proposed measures to control the impacts of light and glare. The Methow Valley economy is supported by the valley’s unique inherited asset from prior generations, of very dark night skies, which provide unparalleled opportunities for stargazing. Local businesses and the towns of Winthrop and Twisp are invested in protecting our dark skies because they are good for business. Dark skies are also an important community value, supported from Mazama to Methow and beyond. Because light can travel beyond property lines, contributing to the phenomenon of “sky glow” (light pollution) as well as interfering with the health and safety of humans and wildlife, it is important that all new development be conditioned to use lighting that is shielded and downcast. The Town of Twisp has Special Provisions for Light and Glare (Section 18.15.070 Performance standards) that include such requirements. **We recommend that the Town emphasize these requirements by including**

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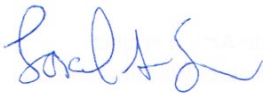
them in the MDNS, in case the proponent is not aware of the requirement to control light and glare.

Historic and Cultural Preservation (13(b),(d))

In this section, the proponent's response indicates that they are not aware of landmarks or evidence of Native American or cultural artifacts on the proposed site, and proposes no measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. As the Methow valley has been home to the Methow People and their descendants since time immemorial, and the area around the current Town of Twisp was historically used by the Methow People, the presence of cultural artifacts in and around the proposed site is highly likely. **If consultation with the state Department of Archaeology and Historic Preservation and the Confederated Tribes of the Colville Reservation (CTCR) and formal Cultural Resource surveys are not included in permitting requirements, we strongly recommend that these measures be added to the MDNS in order to protect and respect the rights of our Indigenous hosts.**

Thank you again for the opportunity to share our feedback. We hope that our suggestions are useful to inform the inclusion of additional mitigation measures that address the potential for adverse environmental impacts. Please feel free to contact me with any questions.

Sincerely,



Lorah Super
Program Director
Methow Valley Citizens Council