

**GRANT COUNTY  
PLANNING COMMISSION**

Chairman: Bill Bailey  
 Vice Chairman: Blair Fuglie  
 Board Members: Carol Dawson, Terry Dorsing, Ann Drader and Kevin Richards  
 Secretary: Doris Long

**COMMISSIONERS' HEARING ROOM - GRANT COUNTY COURTHOUSE, EPHRATA, WASHINGTON**

**MAY 16, 2018 @ 7:00 P.M.**

**2018 Attendance**

NAME	JAN	FEB	MAR	APRIL	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC
BAILEY	W	P	NM	NM	P P							
DAWSON	P	P	NM	NM	P P							
DORSING	W	P	NM	NM	P P							
DRADER	W	P	NM	NM	P P							
FUGLIE	P	P	NM	NM	P P							
RICHARDS	W	P	NM	NM	A P							

P=Present                      A=Absent                      C=Canceled                      W=Webex                      NM=No Meeting Held

Chairman, Bill Bailey, opens the meeting at 7:00 pm.

He reports tonight is a special Public Hearing to hear File #P 18-0079, the 2018 Grant County Comprehensive Plan Update, with the possibility of adoption.

**Board Action:**

Approval of May 2, 2018 Planning Commission Meeting minutes.

Mr. Dorsing moves to approve the minutes as presented.

Ms. Drader seconds the motion.

**ACTION: Terry Dorsing moves to approve the meeting minutes as presented.**

**Ann Drader seconds the motion.**

**Voted on and passes unanimously.**

Mr. Bailey points out he did find one error that should be corrected; page 87 of the Comprehensive Plan displays a picture with the caption reading Moses Lake fair. He requests to have it corrected to read Grant County fair. The correction is noted by staff.

Damien Hooper, Development Services Director, explains that the process for reviewing the Comp Plan update is driven exclusively by statute (RCW 36.70A). The initial stages for public participation included publication in the newspaper, and notification to property owners whose properties' zoning designations were being changed to AG. The property owners who had zoning designations changed from AG to Rural Resource did not receive notice, because it was a change in title only. The density and proposed uses remained the same.

A notice was published in the newspaper on March 22, 2018, and the comment period ran thru April 26, 2018. There were no negative public comments received. There were agency comments received from the Department of Ecology, Department of Fish and Wildlife, Department of Commerce and Grant County Health District. Those comments are going to be reviewed tonight.

The existing Environmental Impact Statement that was prepared for the 1999 Comp Plan, and the subsequent 2006 update, was adopted, and an addendum was issued on March 22, 2018.

There are 16 suggested Findings of Fact, which may be added to as the various elements of the Comp Plan is discussed.

There are 5 suggested conclusions, which may be changed as well.

Ben Floyd, White Bluffs Consulting, presents the Comment Response Matrix for review. Unless the Planning Commission wishes to stop to discuss a particular comment he will proceed through the document.

*(The complete matrix document can be found at the end of the minutes.)*

Mr. Floyd explains if a comment should require future action, and the Planning Commission were to recommend approval of the updated Comp Plan tonight, then that recommendation would mean that the Planning Commission also supports the follow up actions that will take place prior to the Board of County Commissioners' approval. For instance, if further discussion of a comment is necessary with an agency, there could be some subsequent minor language added that wouldn't substantively change the Plan.

Mr. Bailey asks if one of the Findings of Fact address this.

Mr. Hooper responds the motion was crafted to include following through with the comment response matrix, although a Finding could be added as well.

Mr. Floyd notes the comments are basically just to consult, he and Mr. Hooper decide on the relevancy of the comment, and they don't anticipate much change.

Mr. Floyd provides a brief summary of each comment, and the given response.

#### Department of Commerce Comments

*Comment 1* - No discussion

*Comment 2* - No discussion

*Comment 3* - No discussion

*Comment 4* - No discussion

*Comment 5* – General discussion related to Moses Lake's population projection.

Mr. Richards asks if changing Moses Lake's UGA was discussed.

Mr. Floyd replies it was agreed that there probably was not enough time to fully go through the process to build the record, and the case for the change. Moses Lake may do a subsequent amendment when they have more time to prepare.

*Comment 6* – The Department of Commerce encourages the County to remove the R1 zone, and amend the R2 zone to ensure that development patterns inside of UGAs can be served with adequate public services in a financially realistic and sustainable manner. This concept is explained extensively by Mr. Hooper and Mr. Floyd as to why it was not practical for the County. Discussion takes place and the Planning Commission agrees that they do not want to see the zoning changed in this manner.

*Comment 7* - No discussion

*Comment 8* – Mr. Floyd explains to supplement, and add detail to capital facilities, a table will be added to summarize future planning for school districts, fire districts and water and sewer information related to the growth areas in the County.

Mr. Dorsing asks if the information should be reviewed periodically to keep it current.

Mr. Hooper replies the capital facilities plan gets adopted every year at budget time, and it would be fairly simple to review and update the table at that time.

Discussion takes place.

#### Marc Pudists Comment

*Comment 9* - No discussion

#### Grant County Health District Comments

*Comment 10* - No discussion

*Comment 11* - No discussion

*Comment 12* - No discussion

#### ***Draft Critical Areas Code***

#### Department of Ecology Comments

*Comment 13* - No discussion

Comment 14 - No discussion  
Comment 15 - No discussion  
Comment 16 - No discussion  
Comment 17 - No discussion  
Comment 18 - No discussion  
Comment 19 - No discussion  
Comment 20 - No discussion  
Comment 21 - No discussion  
Comment 22 - No discussion  
Comment 23 - No discussion

Department of Fish and Wildlife Comments

Comment 24 - No discussion  
Comment 25 - No discussion  
Comment 26 - No discussion

***Critical Areas and Cultural Resources***

Grant County Health District Comment

Comment 27 - No discussion

Mr. Hooper reports that he would like the Planning Commission to consider a 17<sup>th</sup> Finding of Fact, which would allow for an official zoning map to be developed to mirror the land use designations on the Comprehensive Plan map. This would subsequently rectify any inconsistencies in the zoning and land use designations.

Mr. Hooper displays the Finding, which was written for this purpose:

*17. The Planning Commission finds that the Planning Department should prepare an official zoning map that reflects the Comprehensive Land Use Plan to reflect the changes made during the 2018 update process as well as resolve any outstanding zoning/comprehensive plan amendments which have not been remedied by site-specific rezone.*

There is general discussion concerning the mechanics of the process.

Mr. Hooper explains the suggested motion includes language related to the zoning map; that coupled with the Finding will take care of it. When the Board of County Commissioners take action the zoning will be amended at the same time.

Mr. Hooper explains the 18<sup>th</sup> Finding that is also displayed is related to the comment responses. He reads the Finding for the record:

*18. The Planning Commission finds the comment responses in Appendix B to be appropriately responsive to the commenting agency's concerns, and unless otherwise specified in the recommendation to the Board of County Commissioners, direct that the responses be incorporated into the revised comprehensive plan and development regulations.*

Mr. Dorsing asks if staff foresees any issues down the road, or are they generally happy with the finished product.

Mr. Hooper responds that eventually they will run across something that they will wish they would have addressed. That is always the case, but he doesn't feel there will be any big ticket items.

General discussion takes place.

Mr. Bailey moves to forward a recommendation of approval to the Board of County Commissioners for File #18-0079 to adopt the 2018 Comprehensive Plan, official zoning map and associated development regulations reflecting the revisions in the comment response matrix in Attachment B with the 18 Findings of Fact listed in the staff report in the Affirmative, and the 5 Conclusions.

Mr. Fuglie seconds the motion.  
The motion is voted on and passes unanimously.

**Board Action:**

**ACTION: BILL BAILEY MOVES TO FORWARD A RECOMMENDATION OF APPROVAL TO THE BOARD OF COUNTY COMMISSIONERS FOR FILE #P 18-0079 TO ADOPT THE 2018 COMPREHENSIVE PLAN, OFFICIAL ZONING MAP AND ASSOCIATED DEVELOPMENT REGULATIONS REFLECTING THE REVISIONS IN THE COMMENT RESPONSE MATRIX IN ATTACHMENT B WITH THE 18 FINDINGS OF FACT LISTED IN THE STAFF REPORT IN THE AFFIRMATIVE AND THE 5 CONCLUSIONS.**

**BLAIR FUGLIE SECONDS THE MOTION.  
VOTED ON AND PASSES UNANIMOUSLY**

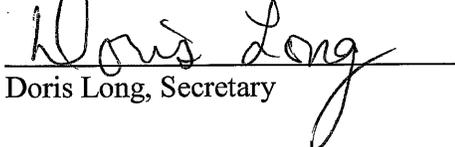
The Planning Commission commends staff on their quality of work, and the document that they crafted. Mr. Floyd states that he has worked with a lot of Planning Commissions, and from the very beginning, even when they worked together on the Shoreline Master Program update, he has been impressed with the Planning Commission's dedication, and attention to detail. Their commitment to the citizens, and the best interest of Grant County, helped make this a better Plan.

Mr. Bailey opens the Public Hearing.  
There are no members of the public present.

Mr. Hooper reports due to not processing any site specific amendments in 2018, the 2019 Comp Plan cycle submittal deadline has been set for the last working day of January.

Meeting adjourned at 8:02 PM.

Respectfully submitted:

  
Doris Long, Secretary

Approved by:

  
Bill Bailey, Chairman

## Grant County Comprehensive Plan and Critical Areas Code – Comment Response Matrix

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Response
<b>Comments on County Comprehensive Plan</b>						
1	Will Simpson, State Department of Commerce				<p>Items supported by the Department of Commerce:</p> <p>The Plan lays out a clear purpose statement that reflects both local and State goals. This includes the wise use and investment of tax dollars for public services, long-range planning that informs short-range actions, that property owners are protected, securing funding for capital projects is prioritized, and public interests are represented in the plan.</p> <p>We support the County's adoption of the OFM medium projection as this represents the most likely projection for Grant County.<sup>1</sup></p> <p>The County's goals and policies chapter establishes a policy framework in which the County and cities will work together to accommodate low and moderate-income families, as the proximity to transportation systems, jobs, support services, and business are available in urban areas.</p> <p>In addition, the County carefully considers the need for affordable housing in rural areas. The County's Housing Element recognizes the importance of farmworker and H-2A housing. Considering the demographics and the significance of the agricultural economy in Grant County, policies and regulations that support farmworker housing are critical to ensuring affordable housing.</p> <p>The County has amended the Natural Setting Element to focus more extensively on water resources in rural areas. The County's Comprehensive Plan discusses the importance of the Columbia Basin Project in multiple chapters, and the significance of this project for regional and statewide agricultural production and growth. Growth Management Services is currently coordinating with the other State agencies and regional stakeholders involved in the Columbia Basin Project. Our staff is available as a resource to the County as you consider and address water resources in your planning efforts.</p> <p>The County has incorporated strong goals and policies to encourage economic development. These include a collaborative approach with local economic development organizations and educational institutions to diversify the local economy; along with a focus on infrastructure investments and a predictable permitting process.</p> <p>We appreciate that the County has recognized Washington State's commitment to rural economic development. The County has carefully evaluated, and clearly articulated, its</p>	Thanks for the feedback!

<sup>1</sup> RCW 43.62.035

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Response
					economic strengths and opportunities, as well as potential constraints to growth in the Economic Development Element. The County's transition from "economically distressed" to significant economic growth over the last two decades demonstrates how rural areas can leverage good planning, natural assets, and human capital to create a solid economic foundation for the community.	
2		4.2.2	76		Section 4.2.2 of the County's Comprehensive Plan states that the County identifies city limits as UGAs in general. We recommend that you remove this language and rely on the future land use map to depict city limits and urban growth area (UGA) boundaries.	Update as suggested
3		4.2.3	76		<p>Section 4.2.3 of the Land Use Element briefly describes the role of airports as essential public facilities and the special consideration necessary for land use planning near airports. This section, along with the relevant subsection of 7.4.3 in the Transportation Element, could be strengthened with additional reference to the requirements for formal consultation with WSDOT and aviation stakeholders.</p> <p>The County should specify that towns, cities, and counties are required by RCW 36.70.547 and 36.70A.510 to formally consult with airport owners, managers, private airport operators, general aviation pilots, ports, and the Aviation Division of the WSDOT to address incompatible land uses prior to updating or amending a comprehensive plan or development regulation that may affect properties adjacent to a publicly or privately owned public-use airport. <u>WAC 365-196-455</u> provides additional guidance on consultation requirements for airport compatibility.</p>	Follow up with WSDOT and airports in the County to receive input and update plan as appropriate
4			-	-	Our agency received a draft of the Comprehensive Plan and Chapter 24.03 of the County's development regulations regarding critical areas and cultural resources. The County's Notice of Intent to Adopt indicated that the materials submitted reflect the update of the Comprehensive Plan and development regulations pursuant to RCW 36.70A.130. If the County does not plan to make any additional changes to the development regulations, the County's record should clearly demonstrate that no additional changes are necessary. If changes are necessary to implement new zones or amendments to the Comprehensive Plan, please ensure those are completed and submitted to the State for review.	Additional updates to the County's development regulations (Unified Development Code) are being made and will be shared with Commerce
5		4.4.2.3	84	-	Section 4.4.2.3 of the County's Land Use Element states that 51% of future growth in Grant County will be located in UGAs during the next 20 years. Elsewhere, Section 4.5 discusses the population projection and allocation process, noting that 72.7% of growth will occur in cities and towns. The County should address this to ensure the use of a consistent population projection and allocation throughout the plan. The County should also consider clarifying whether the 10,178 additional people projected in unincorporated areas will be located outside	The plan will be updated to clarify future growth discussions and ensure consistency among the various plan sections.

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					of UGAs, or if a portion of that population will occur in unincorporated UGAs. This distinction is important for both cities and the County as they plan for capital facilities and transportation infrastructure.	
6		4.4.2.4	85		<p>The County's Land Use Element contains a Residential, Suburban (R1) zone that allows for low-density, single-family estate residential housing that provides for larger lot uses and activities more suburban in character than those found in more concentrated, urban residential neighborhoods.<sup>2</sup> The County's Residential, Low Density (R2) designation allows densities in the range of one to four dwelling units per acre. We have concerns that these land use designations, and the R1 zone in particular, do not permit urban densities as required by RCW 36.70A.110(2).</p> <p>We encourage the County to remove the R1 zone, and amend the R2 zone to ensure that development patterns inside of UGAs can be served with adequate public services in a financially realistic and sustainable manner. Although cities and counties have discretion in how they plan for growth, densities less than four units per acre are difficult to serve with urban levels of services without subsidies or additional tax burdens on the existing community. This becomes particularly problematic when assessing the full life cycle of infrastructure investments and the replacement costs for infrastructure beyond the twenty-year planning period.</p> <p>Low-density development patterns put additional pressure on local governments to amend UGAs in subsequent review cycles, which have the potential to directly or indirectly affect designated resource lands. The County's Resource Lands sub-element recognizes subdivisions and conversion of resources lands as the greatest threat to Grant County's status as a national agricultural producer.<sup>3</sup> We understand that any changes to these zones will require coordination with your municipal planning partners and that the County is actively working to meet the upcoming deadline for the periodic update. We believe investing the necessary time to address this issue will yield long-term benefits.</p>	<p>The UR1 areas are legacy designations that were established in earlier comprehensive planning. These areas are limited in the County and persist at the fringes of only one or two UGAs.</p> <p>The UR2 areas are more prevalent in city and town UGAs, and do serve a very important housing stock function for Grant County. Areas proposed for development that are within a short range of existing urban services are required to extend those services. The affected city is consulted early in the development review process, and only when the City issues a waiver to connections or extensions are properties allowed to move forward with residential development. In instances where a proposed development doesn't meet basic density requirements for the zone, they are required to provide a redevelopment plan for the site showing that additional density can be achieved once urban services are available. Developers of these sites are required to agree to pay for their portion of the improvements.</p> <p>The UR2 areas have all experienced significant development that renders them no longer 'rural'. Annexations have occurred into some of these areas that render removal of these areas from UGAs an untenable solution.</p> <p>Nonetheless, the County appreciates the guidance and will continue to work with the various cities and towns to refine development standards that seek to ensure proper growth of urban services in advance of any UGA development and expansions.</p>
7		7.6.2	169 & 170		The County should ensure that the Transportation Element or technical appendix contains a forecast of traffic for at least 10 years, including the land use assumptions used in estimating travel. <sup>4</sup>	A 20 year traffic forecast (average daily travel volume) has been provided in Tables 7-3 and 7-4 for major roads in the County. Land use assumptions and other detail used in the estimated travel will be provided in the plan.
8		8.6.2 Appendix F	178		The County's plan includes a list facilities included in the plan (Section 8.6.2) as well as a more detailed list of needed facilities in the 6-year Capital Facilities Plan Addendum (Appendix F). We recommend the County develop a more detailed plan that considers projected population and adopted levels of service over the planning period. The Element or supporting technical materials should also demonstrate the proposed locations and capacities of expanded or new capital facilities to ensure compliance with RCW 36.70A.070(3). <u>WAC 365-196-415</u> and our	Supplemental evaluation of specific geographic areas and how services will be met will be included in the plan.

<sup>2</sup> Grant County Comprehensive Plan 4.4.2.4 – Urban Land Use Designations

<sup>3</sup> Grant County Comprehensive Plan 4.4.4.8.2

<sup>4</sup> RCW 36.70A.070(6)(a)(i), RCW 36.70A.070(6)(a)(iii)(E)

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					Capital Facilities Guidebook provide more detailed recommendations for meeting statutory requirements for the capital facilities element.	
9	Marc Pudists		-	-	Telephonic outreach from Marc Pudists regarding land use map (figure 5), he was concerned with removal of Rural Remote as a land use designation and potential impacts to Desert Unit Fish and Wildlife area.	It was not the County's intention to eliminate the Rural Remote designation. It was likely a technical map error. A revised Land Use Figure 5 that reinstated the Rural Remote designation was prepared and will be included in the updated plan.
10	John Ness, Grant County Health District	4.4.3.5 9.5.4 11.2.2.3.2	96 194 217		Bottom of Page 96, it states "County Health Department". Last paragraph of page 194 states "County Health Department". On page 217 second to last paragraph it states "County Health Department". Please change these references to "Grant County Health District".	Update as suggested
11		4.4.3.5	96 & 97		The paragraph that starts at the bottom of page 96, and continues at the top of 97 discusses needing to a more thorough review. Given the ESSB 6091 requiring the well log up front, all projects are given the same scrutiny now. So while it may be worth noting those areas may not have reliable water, they do not require a more detailed water availability review	Noted and discussion will be made more general per the comment
12		9.5.4	195 & 196		On page 195 and 196 it lists Large on-site septic systems and Wastewater Treatment Facilities. There are 3 sewer lagoon systems that I do not see listed in either table. * Marlin Hutterian Sewer Lagoon * Mardon Sewer Lagoon * Winchester Rest Areas (East and West have a combined system) sewer Lagoon.	The table will be updated to include the 3 additional sewer lagoons
<b>Comments on the County's Draft Critical Areas Code</b>						
13	Jacob McCann, Department of Ecology	24.08.060(a)	3	-	24.08.060(a) Consider including the following language : All exempted activities shall use reasonable methods to avoid impacts to critical areas or their buffers. An exemption does not give permission to degrade a critical area or ignore risk from natural hazards. Any temporary damage to, or alteration of a critical area or buffer, shall be restored, rehabilitated, or replaced to prior condition or better at the responsible party's expense. Revegetation shall occur during the wet season, but no later than 180 days after the damage or alteration of the critical area or buffer occurred. All other restoration or rehabilitation shall be completed within 60 days of the damage or alteration, unless otherwise approved by the Administrative Official.	Update as suggested
14		24.08.110(a)	11		24.08.110(a) Recommend adding the following criterion: The inability of the applicant to derive reasonable use of the property is not the result of actions by the applicant after the effective date of this chapter.	Update as suggested
15		24.08.160	13		24.08.160 Should include, per SEPA (Chapter 197-11-768 WAC): (6) Monitoring the impact and taking appropriate corrective measures.	Include suggested language
16		24.08.210	17		24.08.210 Maps and References	No change – this information is already provided

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					<p>Should include some sort of language like the following (although I guess this is stated in 24.08.080):</p> <p>These maps and other available resources (such as topographic maps, soils maps, and aerial photos) are intended only as guides. They depict the approximate location and extent of known critical areas. Some wetlands depicted in these resources may no longer exist and wetlands not shown in these resources may occur. The provisions of this Chapter and the findings of a site assessment take precedence over maps and references.</p>	
17	Jacob McCann, Department of Ecology	24.08.230	18		<p>24.08.230 Site Assessment Requirements Should use "within 300 feet" since this is what was used in 24.08.070(e)(4)(A) and (B).</p>	Update as suggested
18		24.08.250	19		<p>24.08.250 Protection Standards</p> <p>Table 1 (Land Use Intensities) compared to our table <a href="https://fortress.wa.gov/ecy/publications/parts/0506008part2.pdf">https://fortress.wa.gov/ecy/publications/parts/0506008part2.pdf</a>: Moderate doesn't include "Utility corridor or right-of-way shared by several utilities and including access/maintenance road." What about "timber management" vs "Forestry (cutting of trees only)"</p>	Include suggested language in Moderate. Update timber management in Low to be "Woody riparian tree management" instead of timber management.
19		24.08.250	20		<p>Table 2 Need to replace all habitat scores consistent with tables in <a href="https://fortress.wa.gov/ecy/publications/parts/0506008part2.pdf">https://fortress.wa.gov/ecy/publications/parts/0506008part2.pdf</a>: Cat II, high level of function, High- 200 ft doesn't need ft2</p> <p>For Cat III, Moderate level of function needs to include "if wetland scores 8-9 habitat points, use Category II buffers."</p> <p>(e)(5) buffer should be reduced by no more than 25% (not 50%).</p> <p>(j) seems pretty broad. Should this be limited to public roads, bridges etc.? Any other criteria or limitations necessary?</p> <p>(k)(2) Stormwater management facilities. Could this be replaced with the language in our guidance <a href="https://fortress.wa.gov/ecy/publications/documents/1606002.pdf">https://fortress.wa.gov/ecy/publications/documents/1606002.pdf</a> on page 25 (#9)?</p>	Update as suggested, except leave buffer reduction as 35%. Use language related to stormwater to include: "Consistent with the Eastern Washington Stormwater Manual..."

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Response
20		24.08.260(a)	23		24.08.260(a) Needs to have more specifics on monitoring. We recommend that monitoring should occur for at least five years from the date of plant installation and ten years where woody vegetation (forested or shrub wetlands) is the intended result.	Update as suggested and note that monitoring does not have to occur annually for these longer periods. Could occur every few years.
21		24.08.260(b)(3)	24		24.08.260(b)(3)—This isn't really necessary, is it? The table has "enhancement only" ratios, which are a lot more than just doubling.	Delete provision as suggested.
22	Jacob McCann, Department of Ecology	24.08.260(e)	24		24.08.260(e) says "by selecting mitigation sites pursuant to GCC 24.08.260(e)." I think that should be GCC 24.08.260(f), the following section.	Update reference
23		24.08.260(i)	26		24.08.260(i) We recommend that "the proposal use a watershed approach consistent with Selecting Wetland Mitigation Sites Using a Watershed Approach (Eastern Washington) (Ecology Publication #10-06-07, November 2010)."	Include watershed approach as an option for mitigation.
24	Eric Pentico, WA Department of Fish and Wildlife	(24.08.250) (24.08.0300)			<p>Items Supported by WDFW:</p> <p>Wetlands Protections (24.08.250). Your proposed CAO update says, "The Standard buffer widths are based on wetland category, intensity of impacts, and wetland functions or special characteristics. The buffer is to be vegetated with native plant communities that are appropriate for site conditions. If vegetation in the buffer are disturbed (grazed or mowed), applicants planning changes to land that will increase impacts to wetlands need to rehabilitate the buffer with native plant communities that are appropriate for the site conditions. The width of the buffer is measured in horizontal distance." Table 2 Buffer Widths shows that the buffer requirements for wetlands increase in width as the level of disturbance next to wetlands increase. At the same time, wetlands that are rated as being higher in category are given larger buffers, which again increase in size as the disturbance next to them increase in intensity.</p> <p>Fish and Wildlife Habitat Conservation Areas (24.08.0300). Your proposed identification and designation of HCAs includes (1) Areas in which State and Federal endangered and threatened species exist or State sensitive, candidate, and monitor species have primary association; (2) Priority Habitat and Species areas identified by WDFW; (5) Waters of the State as defined by WAC 22-116; (6) Lakes, ponds, streams and rivers planted with game fish by a governmental or tribal agency; and (7) Areas in which anadromous fish have primary association. These are consistent with science and has WDFW's full support.</p>	Thank you for the feedback
25		(24.08.160(a)(1))			General Mitigation Requirements and Mitigation Sequencing (24.08.160(a)(1)). Your proposed CAO update states, "Avoid the impacts altogether by not taking a certain action or parts of an action. Where impacts on critical areas or their buffers will not be avoided, the applicant will demonstrate that the impacts meet the criteria for granting an administratively approved alteration." I could not find, nor does the proposed CAO guide readers to where they may find the "criteria for granting an administratively approved alteration."	<p>The criteria are the additional provisions in 24.08.160 applicable when avoidance is not possible and mitigation is required. Additional wetlands mitigation criteria/provisions are provided in 24.08.260 and additional fish and wildlife habitat conservation area mitigation and habitat management requirements 24.08.350 and 360.</p> <p>To clarify, the word "criteria" in 24.08.160(a)(1) will be replaced with "mitigation requirements"</p>

Comment No.	Commenter	Section No.	Page No.	Line No.	Comment	Response
26		(24.08.340(f)(6))			<p>Protection Standards Riparian Habitat Areas (24.08.340(f)(6) and Table XX). Your proposed CAO update shows a table, which has not been numbered, that states "All other streams not meeting the shoreline jurisdiction criteria" shall be given Riparian Buffer Width (Feet) of 50." In no case are project proponents asked to consider the stream, presence of fish, or the level of disturbance which is proposed to be placed next to the stream. We encourage you to have wider buffers for fish-bearing streams and, as you have done with wetlands, to increase the required riparian buffer width on a stream when the expected intensity of use will be greater.</p> <p>Critical areas in Grant County enrich the county's citizens and citizens of Washington State in numerous ways, such as providing fishing and hunting opportunities, controlling flooding, and filtering pollutants. Providing adequate space for fish and wildlife also provides a visually pleasing landscape, which is good for tourism and the local economy. Grant County's critical areas also provides irreplaceable habitat for fish and wildlife, a public resource, which is why WDFW takes a keen interest in your CAO update. We acknowledge the large step forward the updated CAO represents towards providing for the needs of fish and wildlife and thank you for your hard work. We look forward to continuing to work with you to create a final CAO that meets the needs of fish and wildlife, along with the citizens of Grant County.</p>	Update language with the following: "For streams with known fish presence or high intensity land use next to the stream as defined in Table 1 of 24.08.250 then the buffer will be 75 feet.
27	John Ness, Grant County Health District				<p>Critical Areas and Cultural Resources</p> <p>* On page 32, (m) it states "Septic drainfields and any required replacement drainfield area shall be at least 100 feet from the edge of any HCA". This seems to be quite excessive. Being the HCA is already a buffer to ordinary high water, adding another buffer to it seems overly restrictive. Currently, WAC 246-272A requires a 100 foot setback to ordinary high water. Given that drainfields are buried, once the construction phase is completed, there should be very minimal activity around this area, and often the impacted area is reseeded with grass or allowed to be reestablished with the surrounding flora. There is likely a shoreline standard that is the basis for this, does it allow for any flexibility for this setback?</p>	Update by revising the distance to be at least 50 feet from the edge of any HCA.