



Black Hills Audubon Society

A Washington State Chapter of the National Audubon Society
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P.O. Box 2524, Olympia, WA 98507

September 10, 2004

Thurston County Board of Commissioners
2000 Lakeridge Drive SW, Building 1
Olympia, WA 98502

RE: Interim Ordinance No. 13192 (PRRD and PRD)

Dear Commissioners Oberquell, Wolfe, and MacLeod:

BHAS is a volunteer, non-profit conservation organization whose 1,100+ members in Thurston, Mason and Lewis Counties are concerned about wildlife, their habitats and natural history. We are a member chapter of the National Audubon Society and nearly 1,000 of our members are residents of Thurston County. Our goals are to maintain, restore and protect our natural ecosystems for future generations, and to promote environmental education and nature-based recreation.

BHAS commends BOCC for undertaking study of PRRDs

Thurston County is experiencing rapid growth. In the past year, BHAS has become aware of several PRRDs, both large and small, and question whether PRRDs violate their initial purpose of protecting the rural character of Thurston County.

BHAS commends the BOCC for enacting Interim Ordinance 13192 to enable County Staff, and perhaps a task force, to: 1) study the impacts of PRRDs on the rural character of Thurston County, and 2) amend proposals to the existing ordinances and Comprehensive Plan.

BHAS is concerned with the impact of PRRDs on Critical Areas

BHAS strongly supports serious analysis of item 1(c) of the Interim Ordinance's work plan. One of the many issues the BOCC recommended to be studied, 1(c) of the work plan states that the work plan will consist of:

“The analysis of existing PRD and PRRD developments in the rural area, including but not limited to positive or negative impacts on critical areas.”

BHAS, Washington Audubon, and National Audubon strive to protect critical bird and wildlife habitat including wetlands, riparian areas, prairies, and wildlife corridors, which allow the movement of wildlife between critical habitats.

BHAS has observed completed clustered housing and proposals for clustered housing within the County that perch the cluster immediately adjacent to a complex of wetlands and/or riparian areas. BHAS believes that the clustering aggravates the impact on sensitive critical areas and their associated wildlife more than 1/5 zoning.

BHAS's requests

The GMA was developed with the thought that areas within the Urban Growth Area would have densities that would utilize city services. Dense urban development would be balanced by protecting the character of the rural county with 1/2 or 1/5 zoning.

This interim ordinance, established to remedy problems with the PRRDs, still compromises the rural character goal with its bonuses for clustering and credits for critical lands. To aggravate matters, the septic and water services established in these dense clustered complexes (created by bonuses and critical area credits) often are not designed to hook up to city systems, if such a need/opportunity should arise in the distant future. This reality seems contrary to GMA intentions.

Therefore, BHAS makes the request that the interim ordinance and final "improved" ordinance meet these five criteria.

- 1) Do not allow credit for acreage for wetlands, streams, riparian areas, and important habitat areas in determining the number of houses allowed in a cluster development.
- 2) Do not grant bonus housing for clustering. Zoning allowing more than 1 house per five acres violates the GMA. Instead, use incentives such as expedited processing or reduced application fees.
- 3) When clustering houses for 1/5 zoning, augment the already required buffers for critical areas so that the cluster does not sit immediately upon the critical area buffer.
- 4) Examine the allowed uses for PRRD Resource Use Parcel to assure they are truly rural in character.
- 5) Include citizens (whose neighborhoods have experience the impacts of PRRDs) and environmental organization representatives on any task force established for the study of the PRRDs.

Thank you for this opportunity to comment on this matter.

Sincerely,

Sue Danver and Susan Markey
Conservation Committee Members