

From: [Sonja Wiser](#)
To: peterbracchi@aol.com
Cc: [Oliver Orjiako](#); [Bart Catching](#); [Jose Alvarez](#); [Jacqui Kamp](#)
Subject: RE: comment on draft Comprehensive Plan Update - RCW 36.70A.020 Goals
Date: Tuesday, February 7, 2023 1:50:00 PM
Attachments: [Panning Goals GMA Comprehensive Plan .pdf](#)

Good afternoon Peter. Thank you for your comments related to the 2025 Comp Plan. Your comments have been forwarded to staff and will be added to the 2025 Comp Plan Index of Record. Your name and email has been added to our database to receive future communications related to the 2025 Comp Plan. Thanks again.

From: peterbracchi@aol.com <peterbracchi@aol.com>
Sent: Tuesday, February 7, 2023 1:46 PM
To: Sonja Wiser <Sonja.Wiser@clark.wa.gov>
Subject: comment on draft Comprehensive Plan Update - RCW 36.70A.020 Goals

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Thanks, Please see the attached document

There are 14 Planning Goals for the County to address for Planning [RCW 36.70A.020](#).

I would like to see the county address [RCW 36.70A.020](#) Goal

(10) Environment. Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.

Clark County Residents have paid out \$3.6 million for violation of the Clean Water Act.

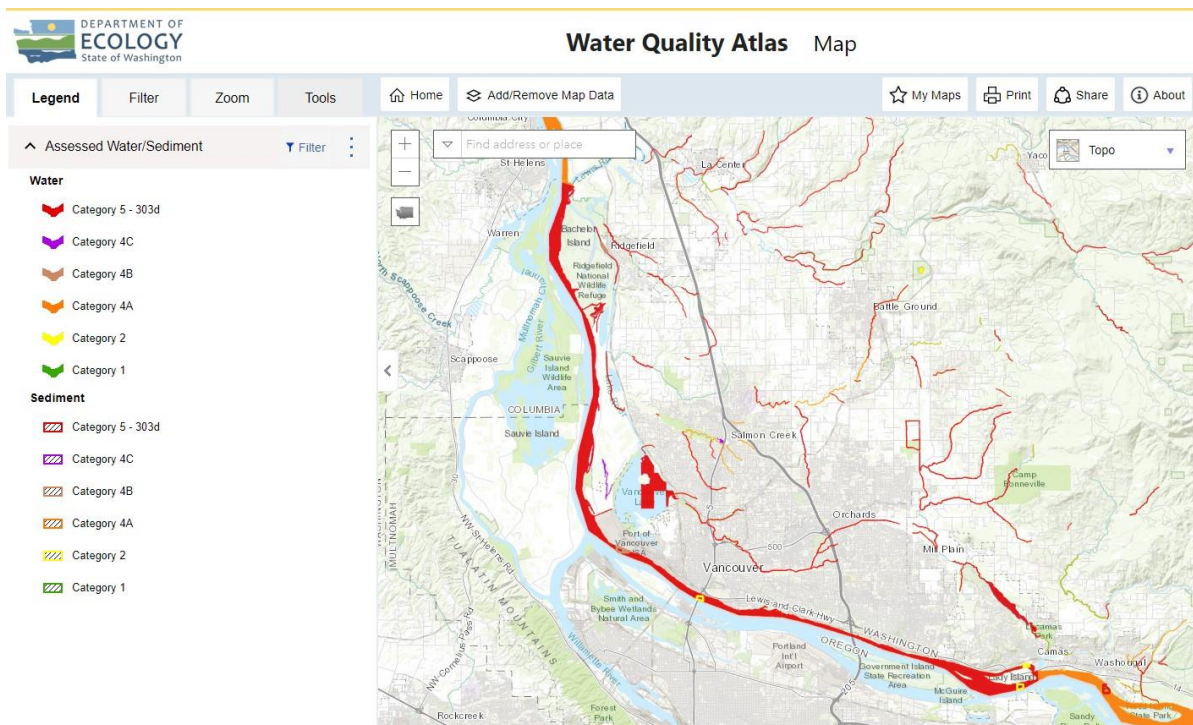
How does the County measure and report on the performance of the County to Protect our Water Quality on GMA Public Owned Critical Areas, specifically Lake Vancouver?

How Can we afford to Expand our current growth if we are not abiding by the GMA and Protecting and Maintaining Publicly Owned Land in existing mapped and documented Critical Areas with Water Resources?

The County has too many Impaired waterways that have been on the EPA list too long of a time. The Impaired waterways and Lengthily time on this list can be used as an indicator as the county not meeting GMA requirement of Not Net Loss for Lake Vancouver and other Waterways.

Notes

Water bodies whose designated uses (such as for drinking, recreation, aquatic habitat, and industrial use) that are impaired by pollutants are identified in the water quality assessment as "Category 5: Polluted water that requires a water improvement project." The 303(d) list, so called because the process is described in Section 303(d) of the Clean Water Act, lists water bodies in the polluted water category.



[Clark county PAID out \\$3.6 Million for Clean Water](#)

Clark County to pay \$3.6 million for violating Clean Water Act

By Stephanie Rice
Published: December 17, 2013, 4:00pm



[Ecology Not Net Loss Indicators](#)



SMP Handbook

TABLE 4-1: POTENTIAL NO NET LOSS INDICATORS for SHORELINE MASTER PROGRAMS

Indicator (all in shoreline jurisdiction)	Functions affected - key categories - water quality, water quantity and habitat	Type of Impairment**	Limitations of indicator	Where	Is data available or reasonable to obtain
		Increases delivery of pollutants.	and others. Combining broad range of activities.		data? CCAP data needs analysis to provide relevant information.
Water quality: 303(d) list. All water quality parameters such as temperature, dissolved oxygen, fecal coliform, heavy metals, toxics, organics and biological indices (e.g., Biological Index of Biotic Integrity). Shellfish listings closures.	Water quality.	Impairment is specific to type of listed 303(d) issue (e.g. increased temperature, low dissolved oxygen, increased fecal coliform, heavy metals and toxic organics.)	How relate to functions? Some impacts from outside shoreline jurisdiction. Only impaired waters are listed & measured; no WQ improvement project in place. No criteria to remove from list. Sampling methodology changes, not always comparable. Marine & fresh water lists updated in alternating 2-year cycles. Some impacts from outside shoreline jurisdiction and municipality. Emergency closures updated regularly. Uneven data. Changes may be too frequent for NNL purposes. Limited to	Rural, urban.	Accessible data from Ecology. Is water body on or off list? In some cases, only a portion (e.g., reach) of a water body is listed. 303(d) - comprehensive, Dept of Health Shellfish Program.