



Missoula City-County Health Department
WATER QUALITY DISTRICT

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June 15, 2016

TO: Mitch Doherty
Missoula County Community and Planning Services

FROM: Michelle Hutchins
Missoula City-County Health Department, Water Quality District

RE: Proposed Missoula County Subdivision Regulations Chapter 3 Revisions

The Missoula City-County Health Department, Water Quality District has reviewed the Draft Missoula County Subdivision Regulations Chapter 3 Revisions and has the following comments.

The Water Quality District strongly supports the proposed revisions to Chapter 3 of the Regulations related to protection of riparian resources.

3.2.1.3 Sediment Filters

We suggest the following language: "Preserve vegetation that filters sediment and other pollutants to maintain water quality."

3.2.4.2 Common Area, No Build

We strongly support requiring that riparian resource areas be designated common areas in major subdivisions and that riparian areas be designated no build zones in minor subdivisions. These requirements help prevent landowners from placing infrastructure in unsafe locations and protect vital riparian resources from degradation. The Water Quality District recently completed a grant-funded study of the management of riparian areas designated through the subdivision process. One of our findings was that common ownership greatly reduced or eliminated encroachment into and degradation of riparian areas.

Livestock grazing can cause severe riparian degradation and water quality impacts. Livestock grazing and the associated impacts are more likely to happen on riparian areas on individual lots rather than in common areas. Cattle, horses and other livestock can trample riparian vegetation, destabilize banks and pollute water with excrement. We recommend that best management practices be required for any grazing. This includes limiting livestock to a sustainable number, using wildlife-safe fencing to restrict livestock access to the stream and providing off-stream water. This could be addressed in 7.5.19.2 Proposed Use and/or 7.5.19.4 Mitigation. Perhaps language could be added to clarify that any grazing would have to be carried out in a low-impact, sustainable way. Some suggestions for language are "If livestock grazing is proposed, riparian resources must be protected through the use of wildlife-safe

fencing, providing off-stream water and limiting livestock to a sustainable number that will not degrade the riparian resource.” Or: “If livestock grazing is proposed, riparian resources must be protected using best management practices that are specified in the Management Plan.” A part D could be added under Mitigation: “D. Low-impact grazing plan, if livestock grazing is proposed.”

We appreciate the opportunity to comment. Please let us know if you would like to discuss our comments further.

A handwritten signature in black ink, reading "Michelle Hutchins". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Michelle Hutchins, M.S., R.S., QEP
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Missoula City-County Health Department
Water Quality District