



Missoula City-County Health Department
WATER QUALITY DISTRICT

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June 15, 2016

TO: Christine Dascenzo
Missoula County Community and Planning Services

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

RE: Riparian Resource definition in Subdivision Regulations 2.1.1

The Missoula City-County Health Department, Water Quality District would like to comment on the definition of Riparian Resource proposed in 2.1.1 of the Subdivision Regulations.

Included in the proposed definition is the sentence "Riparian resources do not include an irrigation ditch or irrigation induced wetlands." We suggest that this provision be modified to be consistent with the City of Missoula Subdivision Regulations, which states in its definition of Riparian Resource (2-020.102) "An irrigation ditch that does not lie within a floodplain, and measures less than 3 feet in width at its widest point on the subject property, as measured from the high watermark of the ditch, is not considered a riparian resource for the purpose of these subdivision regulations."

The Water Quality District actively participated in the public discussion relating to irrigation ditches and whether they should be included as riparian resources when the City revised its regulations several years ago. We argued, along with staff from other agencies and organizations, that although irrigation ditches are not natural waterbodies, many sections – particularly the larger sections – support significant riparian vegetation that functions in the same way as that along natural waterbodies. Given that a portion of the water carried by ditches returns to the natural waterways as return flow, protecting water quality and providing shade that helps keep water cooler in the ditches is important to the integrity of the natural waterbody that receives the water. Riparian vegetation filters and removes sediment, nutrients and other pollutants and also shades the ditch, keeping water cooler and helping to prevent oxygen depletion and the associated impacts to aquatic life in the receiving waterbodies. Also, parts of the ditches themselves are inhabited by fish, and vegetation along the ditches provides habitat for birds and other wildlife.

For all of these reasons, we urge the County to adopt language similar to that adopted by the City. We believe that a three-foot threshold is a reasonable compromise that will protect some riparian resources from degradation and provide significant water quality and wildlife benefits.

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 that reads "Michelle Hutchins". The signature is written in a cursive style with a large, sweeping flourish at the end.

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