

**From:** Davenport, Steve  
**Sent:** Wednesday, December 19, 2012 8:45 AM  
**To:** Lindsay, Robert  
**Cc:** Pederson, John; Jensen, Paul  
**Subject:** Comment on CARA Regulation Review

Rob,

Thank you for the opportunity to comment on the CARA regulation update. The effort thus far has focused on the groundwater impacts of development and how to mitigate those impacts to allow an acceptable level of nonresidential development in rural areas. It may be appropriate to expand the scope slightly to consider the potential land use implications that could occur with a relaxation of the CARA regulations.

The CARA regulations were originally adopted to ensure protection of the aquifer and were not intended as a primary driver of land use. However, the CARA regulations have prohibited a large number of commercial, industrial and residential uses that the zoning would otherwise allow. The CARA regulations have been in effect for approximately ten years and a sudden change could potentially result in rapid development in some areas. Analyzing and understanding these potential impacts is important to avoid any unintended consequences.

The Mead/Mt. Spokane Limited Development Area (LDA) provides an example of how changes to CARA could affect land use. The Mead/Mt. Spokane Area includes 50 acres of vacant land within the Light Industrial and Regional Commercial land use categories. These zones allow a broad range of industrial and commercial uses including large box retail and multi-family residential. A maximum build out of multi-family residential could allow up to 1,500 dwelling units in the area. The Mead/Mt. Spokane area also includes an additional 25 acres of vacant Community Commercial zoning which would allow a range of smaller commercial uses and single family/duplex development.

A relaxation of the CARA regulations could also increase nonresidential development that is allowed in rural zones outside of limited development areas and rural activity centers. These uses include churches, schools, master planned resorts and commercial recreation areas. These uses often include large facilities that serve populations within the UGA.

Another issue that the study may want to address is the GMA restrictions on sewer service in rural areas. At what point does a sewer system become an urban service which is prohibited by GMA? There may be differing interpretations of this standard for limited development areas and general rural areas.

Paul Jensen in our office also offers the following comment:

If public sewer to this area is very expensive now and the Limited Development Area is allowed to develop by changing CARA reg's to the extent the current zoning allows, future expansion of the Urban Growth Area in this area (as currently considered by the County Commissioners) would become even more difficult. As needed urban services such as public sewer, area transportation improvements, schools, police, storm drainage and others would be allowed at lower levels of service and then, need to be increased without even the current development potential to help pay the cost to provide urban levels of service. This would act as a serious detriment to urban expansion in this area in the future.

Also Rob, would it be possible to make all comments from committee members available to the other members, I would be interested in reading the other members comments to help me better understand the issues.

Thank you,

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