

**Environmental Impact Statement (Draft 1)**  
**Okanogan County Comprehensive Plan Revisions**  
**March 11, 2009**

**Section 1**  
**Introduction**

**Executive Statement**

This environmental impact statement (EIS) is prepared to assist in review of the proposed amendments to the Okanogan County Comprehensive Plan, Comprehensive Plan Map, Zone Code, Zone Map, Subdivision Regulation, Critical Areas Ordinance, Shorelines Master Program, and Fire Protection Plan. The purpose is to provide a comparison of proposed alternatives on a programmatic level in an attempt to quantify the probable, significant, and adverse impacts the proposed changes might cause. The objective is to provide a tool to facilitate review and to assist in the drafting of the components of the plan as preferred alternatives are identified.

To allow this EIS to keep pace with the review process of the plan it is anticipated that two drafts will be issued, each with its own comment period, prior to the issuance of a final environmental impact statement. This draft will be issued on March 11, 2009 with a revised draft to follow the Okanogan County Regional Planning Commission (PC) hearings currently scheduled for March 16 and 19, 2009. Deliberation by the Planning Commission is anticipated to occur on March 30 and 31, 2009. The revised draft EIS will review any changes proposed to the plans under review and will be issued as soon as possible thereafter. The Final EIS will be issued following the Board of County Commissioners (BOCC) hearings but prior to final adoption of the plans under review. Addendums to the draft EIS will be prepared if necessary to review changes proposed by the BOCC.

The Shorelines Master Program (SMP) differs from the other plans under review in that it requires approval by the State of Washington Department of Ecology. The proposed revisions to the SMP are based on a regional approach. Following the local adoption of the SMP by the BOCC for the unincorporated areas the Cities will finish the review of the SMP for the incorporated areas. It is proposed at this time that the BOCC will adopt the SMP for the unincorporated areas by July, 09. It is anticipated the Cities will complete their work by the first half of 2010 with the review of the regional SMP completed by the Department of ecology by 2010. An addendum to this EIS will be prepared to review the accumulative impacts of the regional SMP.

The Critical Areas Ordinance (CAO) works in coordination with the regional SMP. Because of the extended timeline for review and adoption of the regional SMP it may be necessary to revisit the CAO at that time and any proposed revisions included for review in the addendum to the EIS. Both the SMP and CAO will be reviewed for consistency with the Comprehensive Plan. Any revisions proposed to the Comprehensive Plan at that time will be considered in the annual amendment process.

## **Scoping**

This EIS began with a scoping period which began on Jan 14, 2009 and ended on Feb 20, 2009. The purpose of the scoping process was to identify areas for review in this EIS in addition to those proposed by the SEPA Responsible Official. The areas to be reviewed in this EIS are:

- 1) Earth
- 2) Air
- 3) Water
- 4) Plants
- 5) Animals
- 6) Energy and Natural Resources
- 7) Environmental Health
- 8) Land and Shoreline Use
- 9) Housing
- 10) Aesthetics
- 11) Light and Glare
- 12) Recreation
- 13) Historic and Cultural Preservation
- 14) Transportation
- 15) Public Services
- 16) Utilities
- 17) Economic Impacts
- 18) Public Safety
- 19) Customs and Culture
- 20) Climate change

## **Structure**

This EIS contains a list of planning assumptions that guides the discussion. These assumptions are not meant to be bright line requirements or prohibitions but serve only to bracket the discussion of probable, significant, and adverse impacts and, in some cases, to serve as a foundation against which to begin the discussion of public benefit. In all parts of this EIS the intent is not to provide an exhaustive analysis of all possible scenarios. The goal of this EIS is to provide a reasonably thorough discussion of the probable, significant, and adverse impacts associated with the plans under review.

This EIS is organized by first listing the plan under review such as comprehensive plan etc. The EIS then lists the areas to be reviewed such as Water Quality, etc. It is organized in this manner to allow anyone reviewing the EIS to find the complete discussion on each plan in a single section. Those areas of review for which no impacts are anticipated will still be listed with that notation.

The final section in this EIS will contain a general discussion of the accumulative impacts brought about by the revisions to the plans under review. It will be this section that attempts to summarize the inter-relationship between the plans and the implementing

regulation and how this relationship influences the language, hence the impacts, each might bring about.

The plans under review contain alternatives which will be compared in this EIS. In each case alternative 1 represents the “no action” alternative. The alternatives progress from alternative 1-no action, to no more than 3 additional alternatives. Alternative 1 in most cases is the least restrictive alternative progressing to the most restrictive alternative. Where possible at this stage of the review process the EIS will propose a preferred alternative.

### **Planning Assumptions**

This section contains statements the SEPA Responsible Official has used for guidance in writing this EIS. As this EIS is reviewed for completeness and accuracy it is important to review these assumptions for consensus amongst the citizens participating in the review processes. Where possible to determine these assumptions should be reinforced or revised to represent key elements of the vision of Okanogan County.

1) Agriculture is a critical element of the economy and culture of Okanogan County. The Comprehensive Plan and implementing regulation should support the preservation of agriculture and agricultural land by providing land use tools that accomplish the following:

- \*Create processes that allow thoughtful value added development that avoids incompatible uses and allows the preservation of the critical mass of land necessary to support a viable agricultural economy.

- \*A broad mix of permitted and conditional uses in resource designated areas must be created to allow the landowner every reasonable opportunity to respond to changing market conditions and economic challenges hence reducing the need to convert the land on a wholesale basis to other uses.

- \* An effective and efficient transportation system must be maintained to support the transports of products to markets.

2) The natural environment is a critical element of the economy and culture of Okanogan County by providing opportunities for recreational activities and a variety of outdoor centered businesses. The Comprehensive Plan and implementing regulation should provide effective review processes and guidance for land use development that protects the natural environment from unreasonable or unnecessary impacts.

3) The current minimum requirement district zoning covers much of Okanogan County and allows 1 acre lot densities. Current public health requirements, dependable and demonstrable water supplies, and the apparent hesitancy on the part of the public and appointed and elected decision makers to approve sizeable developments approaching this base density, especially when adjacent to agricultural operations, renders this zoning designation unrealistic. Base density in zoning for rural high density areas should reflect the general viewpoint of an acceptable level of development in these areas.

4) Code enforcement is an integral part of an effective comprehensive plan and implementing regulation. Regulation should be clearly written, reasonable, and should contain effective triggers for enforcement. The Comprehensive Plan must be supported by a complete zone code, subdivision regulation, SMP, and CAO which work consistently with each other. Current practice of code enforcement on a complaint only basis or when initiated by a land use application creates challenges with equal protection and can result in unnecessary harm to the environment brought about by activities such as road building before they come under review.

5) The existing transportation plan is being adopted into the Comprehensive Plan. The transportation plan is proposed for review and update in 2010.

6) The Recreation Plan is being adopted into the Comprehensive Plan. The recreation plan is proposed for review and update in 2010.

7) The process for review and adoption of the Capital Facilities Plan is being adopted into the Comprehensive Plan. Review of the Capital Facilities Plan is proposed for 2010.

8) Water supply is a critical factor that restricts the potential development in Okanogan County. The transfer of water rights out of the county has long range impacts that have not been thoroughly analyzed and quantified. The conversion of water rights from agriculture to other uses has long range impacts that have not been thoroughly analyzed and quantified.

## **Section 2 Comprehensive Plan**

### **Earth**

The Comprehensive Plan serves as the foundation of land use regulation in the County. The land use designations it contains are applied based on selected criteria and the vision of the citizens. The resource lands designation use soil type as criteria for designation hence the protections afforded by this designation apply to soils. The critical areas ordinance will identify areas of steep grade and soil instability which should be reflected in the Comprehensive Plan designations in terms of density and compatible uses which are implemented on a parcel specific basis through the zone code.

The Comprehensive Plan applies land use designations which guide underlying zoning and is the baseline for project review. The Comprehensive Plan contemplates no reduction in the project review process through which each project application would pass. It is through the project specific review that a finer analysis for impacts to the earth would occur.

All proposed alternatives for the Comprehensive Plan, with the exception of alternative 1-no action, result in the potential for less density throughout the county. Less density, coupled with the clustering process the plan encourages, should result in less impact to the earth by reducing the potential for human impact. By encouraging the protection of

resource lands the Comprehensive Plan should result in development that imparts less impact to the earth.

Existing lots analysis

Potential lots analysis-no action

Potential lots analysis-alternative 3

## Air

Average Daily Trips (ADT) by automobile, emissions from wood or other non-electric heating, and removal of vegetation are the chief contributors to any degradation of air quality in Okanogan County. These contributors are periodically worsened by temperature inversions which can trap the contaminants.

The alternatives proposed in the Comprehensive Plan, with the exception of the no action alternative, will result in less potential for density. The proposed clustering provisions in the zone code should result in a tighter settlement pattern in the areas designated as rural and resource lands resulting in shorter drive times and the potential to capitalize better road infrastructure for greater efficiency. Emphasis is placed on development in the Urban Growth Areas (UGA) which should result in higher residential densities and the location of business and service centers adjacent to the existing towns and cities. This should further reduce driving times and diminish emissions. The tighter settlement pattern and other points previously discussed should leave more areas of open space for vegetation which improves air quality.

Use of wood stoves and fossil fuel burning heating devices are covered by air quality regulation found in the Revised Code of Washington, Washington Administrative Code, and in Federal regulation. Discouraging residential development that is “off the electrical grid” or by encouraging the use of solar and wind energy generation for such development or elsewhere in the county can diminish reliance on fuel burning heat sources. Enforcement of this regulation and other codes is discussed elsewhere.

## Water

Water supply, both in terms of authority to withdraw both ground and surface water and the demonstration of adequate supplies, serves as a critical factor in restricting the potential for residential and other development. The Comprehensive Plan should be as consistent as possible in designating higher levels of density in areas with the ability to provide adequate water supply. Every effort reasonably possible should be directed at quantifying water supplies and an on-going monitoring program should be devised and implemented, preferable through the watershed planning units. Review processes that support implementation of the comprehensive plan should consider water supply in terms of both adequacy and monitoring on-going impacts.

The use of water and more specifically the conversion of agricultural water supplies to other uses or the transfer of water rights out of the county are discussed elsewhere. The Comprehensive Plan should contain clear policy language regarding the impacts these

practices have on the local economy and on the ability to preserve viable agricultural land.

The Comprehensive Plan, except for the no action alternative, reduces the potential for overall density and encourages clustering of higher density development. (see subdivision discussion) Clustering density allows a greater opportunity to create group water delivery systems and sanitation facilities. The use of these systems reduces the potential for contamination of ground and surface water supplies by creating more efficient on-site waste systems and by allowing well construction that reaches deeper aquifers and reduces the number of wells on the ground.

### **Plants**

The Comprehensive Plan, with the exception of alternative 1, proposes lower densities overall and encourages clustering of higher density where it can be supported. A more dense settlement pattern allows more open space which provides areas for plant life to grow. Nothing in the Comprehensive Plan would result in a diminished review process for land use applications that would result in increased impacts to plant life.

### **Animals**

The Comprehensive Plan, with the exception of alternative 1, proposes lower densities overall and encourages clustering of higher density where it can be supported. A more dense settlement pattern allows more open space which provides habitat for animals, including migration corridors and wintering areas. Nothing in the Comprehensive Plan would result in a diminished review process for land use applications that would result in increased impacts to animal life.

### **Energy and Natural Resources**

The Comprehensive Plan does not regulate energy sources other than through the alternate energy overlay which is proposed for major alternative energy projects (see discussion under zone code).

The Comprehensive Plan, except for alternative 1-no action, proposes lower densities overall and encourages clustering of higher density where it can be supported. By designating areas for higher densities that can be served by existing energy infrastructure and that reduces the duration or number of ADT'S the increased demands on the energy delivery system is reduced.

### **Environmental Health**

The comprehensive plan as proposed contains process for annual review of the capital facilities plan. Consistent review of the capital facilities plan is essential to predicting future levels of service and expenditures of public money. There is no baseline proposed for acceptable levels of essential public services in the comprehensive plan.

Impacts attributed to specific projects are identified through SEPA on an application specific basis. Nothing in the comprehensive plan eliminates or reduces review of any category of application.

### **Noise**

Noise impacts attributed to specific projects are identified through SEPA on an application specific basis. Nothing in the comprehensive plan eliminates or reduces review of any category of application.

### **Land and Shoreline Use**

Land use designations in a comprehensive plan serve several purposes. The designations, when based on community vision, offers the land owner guidance on the sort of development activity that is supported. The designations, when based on an areas ability to support density, offers the land owner guidance, on a pre-application basis, of the challenges they would encounter in developing the property. When the land use designations are based on vision and carrying capacity as well as a recognition that a critical mass of resource lands must be available for resource based activities then the needs of both the land owner and public are met.

The comprehensive plan proposes several land use designations designed to be applied based on the aforementioned principles as well as the application of criteria generated by the neighborhood groups and technical committees. The use of these land use designations will serve to effectively direct growth and resource based activities and to protect the economic and cultural base of future generations.

The comprehensive plan and zone code should prevent the permitting of incompatible uses. These codes also provide the landowner guidance in terms of potential development and protection from impacts created by incompatible uses. The use of the resource designation is an example of how land use designations can protect an important activity while at the same time providing clear guidance on how value derived from development on the land can be realized.

The economic impact section of this EIS will provide greater analysis of the types of economic benefits activities on the land provides.

The section of this EIS discussing the Shoreline Master Program (SMP) and Critical Areas Ordinance (CAO) will deal with effects on the shoreline environment.

### **Housing**

The affordable housing section of the comprehensive plan quantifies levels of housing stock and the challenges faced in providing adequate levels of affordable housing. The inclusion of this section in the comprehensive serves as a platform from which to consider density bonuses in the public benefit rating system for affordable or worker

housing and assists in designing a proportionate nexus model to be employed in the review of projects that can impacts affordable housing.

The comprehensive plan influences the affordable housing issue through the adoption of urban growth areas (UGA) for cities and towns. By creating agreement between the cities and towns and the county the city or town has greater certainty in terms of their goals for future expansion. This greater certainty allows the city or town to better plan the expansion of services and to tie the capitalization of these expansions to projected revenue streams or developer contributions, or both. Affordable housing depends on the availability of water and sewer service and is most likely sited in UGA's.

### **Aesthetics**

The comprehensive plan as proposed contains no design requirements or design review proposals that would impact aesthetics. The section regarding the use of overlays and the section of this EIS discussing the subdivision code will deal with the proposals for ridgeline protection and dark sky requirements.

### **Light and Glare**

The comprehensive plan as proposed contains no requirements that would impact light and glare. The section regarding the use of overlays and the section of this EIS discussing the subdivision code will deal with the proposals for ridgeline protection and dark sky requirements.

### **Recreation**

The existing recreation plan is adopted into this comprehensive plan. It is proposed for review in 2010.

The comprehensive plan as proposed contains language emphasizing the importance of recreational activity to our economy. The section of this EIS discussing economic development deals contains more detail on this issue.

The capital facilities element of the comprehensive plan contains language identifying trails as an important capital facilities component.

The subdivision code revision creating the cluster subdivision process proposes a density bonus for extension of trail right of way if identified in the recreation/trail plan.

### **Historic and Cultural Preservation**

The impact to historic and cultural sites is evaluated on a project specific basis. There is nothing proposed in this comprehensive plan that reduces or eliminates any review process for impacts to historic and cultural resources. The inclusion of maps in the critical areas ordinance is not contemplated as this creates a risk to the security of these sites.

### **Transportation**

The Okanogan County transportation Plan is adopted into this comprehensive plan. The transportation plan is proposed for review in 2010.

### **Public Services**

The comprehensive plan adopts a process for annual review of the capital facilities plan. A consistent review of the capital facilities plan will allow the county to identify infrastructure necessary to maintain acceptable levels of service.

The alternatives in the comprehensive plan, with the exception of alternative 1-no action, results in lower density levels overall. The areas designated for higher density are based on designation criteria including proximity to existing transportation infrastructure. The cluster subdivision process proposes proximity to the transportation grid in resource designated areas as eligible for a density bonus. The comprehensive plan promotes a more compact settlement pattern which, coupled with the items just discussed, should minimize impacts to the transportation grid hence to public service delivery.

The comprehensive plan contains no specific provisions to identify levels of service for schools, medical facilities, or other public service agencies. Impacts in these areas are identified on a project specific basis on review of a specific application.

Future amendments to the comprehensive plan should consider a process for discussion amongst school districts, fire districts, local governments, and other service providers to establish future level of service projections and a methodology for analysis of impacts to level of service.

### **Utilities**

Proposal for provisions for the locating utilities, including alternative energy facilities, are proposed revisions to the zone code. Discussion of this item is located in that section of this EIS.

### **Economic Impacts**

The economic development element of the comprehensive plan recognizes and promotes the importance of a diversified economic base. Agriculture and resource based activities such as mining, construction, recreation and tourism, human services, retail activities, and government services are important elements of the economy of Okanogan County.

The comprehensive plan and supporting zone code and subdivision regulation promotes economic development by providing the processes by which adequate inventories of land is made available, from a regulatory perspective, for these activities. The comprehensive plan should recognize the need for a balanced mix of development activities and recognize the need to retain the critical mass of land necessary to sustain resource based activities and provide land use tools to accomplish this end.

The review processes that support the implementation of the comprehensive plan must be thorough enough to accomplish the effective review of project proposals for impacts but not onerous to the point the processes themselves become an obstacle to economic

development. Where possible, programmatic review should identify possible impacts of permitted uses and prescribe mitigations to those impacts prior to project application. This effort provides a level of predictability for land owners and project proponents and allows local government to anticipate impacts that economic development activities can cause to infrastructure and service delivery agencies.

The availability of building sites and housing stock, including affordable housing, influences economic development activities. The alternatives in the comprehensive plan alter the potential for building sites as follows.

These numbers do not represent the results of an exhaustive analysis but rather serve as basis for comparison of the different alternatives.

A consideration that is difficult to quantify but must be recognized as an issue is the reliance of some property owners on the value of their land holdings as retirement revenues. The impact that regulation has on a landowners ability to derive value from the land must be considered. As well, their must be recognition that land provides a basis for many activities that comprise important elements of our economic base must be recognized as well. Processes that provide a balanced approach to meeting both of these needs are proposed in this comprehensive plan and supporting regulation.

**Public safety**

The comprehensive plan proposes a process for annual review of the capital facilities plan. The capital facilities plan should contemplate the future need for public safety infrastructure.

**Customs and Culture**

**Climate Change**

**Section 3  
Comprehensive Plan Map**

The comprehensive plan map serves as the document that adopts the land use designations in the comprehensive plan and as such offers no additional regulation. The acreage in each designation for alternative 1-no action and the map currently under review is provided below:

Alternative 1-no action  
**CURRENT ZONING**

<b>ZONE</b>	<b>ACRES</b>
NEIGHBORHOOD USE	14.224
AGRICULTURAL - RESIDENTIAL	491.050
AIRPORT DEV DIST	176.645
BARNHOLT	642.670
CARLTON AGRICULTURAL	66.753

CARLTON COMMERCIAL	16.796
COMMERCIAL	223.291
INDUSTRIAL	7.479
LOW-DENSITY RESIDENTIAL	4605.097
MINIMUM REQUIREMENT DISTRICT	2234562.916
MOLSON OVERLAY	68725.526
MRD 1	601.612
MRD 12,500	27.531
PLANNED DEVELOPMENT	61.412
RURAL RESIDENTIAL	17430.977
SCHOOL DISTRICT 350	1043944.462
SPECIAL REVIEW COMMERCIAL	36.069
SUBURBAN - RESIDENTIAL	296.384
URBAN RESIDENTIAL	32.415
VALLEY FLOOR	27488.096

Map under review

Incorporated Cities	7,877
Urban Growth Areas	14,568
Urban Resource	11,958
Lamirds	918
Rural High Density	11,789
Rural Medium Density	84,506
Rural Low Density	66,354
Agricultural Lands	635,688
Forest Lands	1,881,050
Reservation (retains MRD zone)	678,428
Water Body	17,274

The review for impacts of the land use designation and other elements of the comprehensive plan is provided in section 2 of this EIS.

#### **Section 4**

##### **Zone Code**

The zone code serves as the parcel specific land use designation. The zone code applies land use controls such as maximum lot coverage, minimum lot size, permitted uses, and

conditional uses. The zone code implements the comprehensive plan and a parcel specific zone must be compatible with the comprehensive plan designation.

The zone code is restricted by the use of other regulatory overlays such as the Shorelines Master Program and Critical Areas Ordinance. The sections of this EIS dealing with shorelines and critical areas will contain the discussion of impacts to habitat, flood areas, etc.

The zone code as proposed implements the land use designations contained in the comprehensive plan. The discussion of impacts in the zone code would mirror the discussion of impacts in the comprehensive plan so will not be repeated here.

Several of the zones have been renamed to facilitate there general application throughout the county. New zones, such as forest-20 and agricultural-20 have been created for use in the resource land designation of the comprehensive plan. Rural-20 has been created for use in the rural low density land designation in the comprehensive plan. The zone code parallels the comprehensive plan in that it generally reduces the potential for density in the county.

**Section 5  
Zone map**

The zone map serves to assign a specific zone on a parcel specific basis. The zone map utilizes designations from the general zone code and as such offers no additional regulation. The acreage for each zone designation in alternative 1-no action and the proposed map currently under review are provided below.

**CURRENT ZONING**

<b>ZONE</b>	<b>ACRES</b>
NEIGHBORHOOD USE	14.224
AGRICULTURAL - RESIDENTIAL	491.050
AIRPORT DEV DIST	176.645
BARNHOLT	642.670
CARLTON AGRICULTURAL	66.753
CARLTON COMMERCIAL	16.796
COMMERCIAL	223.291
INDUSTRIAL	7.479
LOW-DENSITY RESIDENTIAL	4605.097
MINIMUM REQUIREMENT DISTRICT	2234562.916
MOLSON OVERLAY	68725.526
MRD 1	601.612
MRD 12,500	27.531
PLANNED DEVELOPMENT	61.412
RURAL RESIDENTIAL	17430.977
SCHOOL DISTRICT 350	1043944.462
SPECIAL REVIEW COMMERCIAL	36.069

SUBURBAN - RESIDENTIAL	296.384
URBAN RESIDENTIAL	32.415
VALLEY FLOOR	27488.096

Map under review

Incorporated Cities	7,887
Minimum Requirement District	678,428 (reservation lands)
Industrial	88
R-1	17,132
R-3	10,060
R-5	84,391
R-20	66,355
AG-3	11,958
AG-20	635,804
F-20	1,881,050
Water Body	17,274

## **Section 6**

### **Shorelines Master Program and Critical Areas Ordinance**

The accumulative impacts analysis for the Shorelines Master Program is being completed under contract. An addendum to this EIS will be released when that work is completed.

The critical areas ordinance proposes two significant changes. First is the requirement that a land use application is necessary to trigger application of the critical area ordinance is proposed for removal. The second is the incorporation of the flood management program into the critical areas ordinance. A county-wide critical areas map is proposed as well.

The critical areas ordinance (CAO) works in concert with the shorelines master program (SMP) where the jurisdictional boundaries interface. The CAO further impacts the function of shorelines by implementing protective regulation to areas that impact shorelines but are beyond the jurisdiction of the SMP. The CAO will be reviewed for consistency with SMP terms and designations where this consistency is necessary.

The analysis of impacts for the CAO will be conducted concurrent with the analysis of the SMP. An addendum to this EIS will be necessary when the analysis has been completed for review.

## **Section 7**

### **Fire Protection Program**

The fire protection program serves to recognize the danger of residential or commercial development in areas prone to wildfire and either provides information to educate the

public in techniques to minimize risk or imposes regulation designed to minimize risk and or increase survivability, or both. The fire protection program in either approach contains suggestions or requirements for defensible space, use of fire retardant materials, creation of additional water supply and delivery systems, provision of escape routes for residents and fire fighting equipment, etc. The fire protection plan is proposed for county wide adoption as an overlay that would influence underlying zoning, subdivision regulation, and the building codes.

The implementation of a fire protection plan generally minimizes the potential for impact to the environment by reducing the potential for catastrophic fires and the environmental impacts they cause by the destruction of vegetation which in turn eliminates habitat and promotes soil erosion, wind blown dust, and other environmental impacts. The fire protection plan does not regulate density, permitted or conditional uses, or the application of SMP or CAO regulations. Rather, the fire protection plan informs these review processes and can impose the additional requirements noted above.

Due to the nature of the fire protection plan it does not minimize other protective regulation or circumvent or minimize other review processes. As such it has no potential to cause probable, significant, or adverse impacts.

### **Hazard Mitigation Plan**