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JUN 19 2014

OKANOGAN COUNTY
PLANNING & DEVELOPMENT

E. Michael Ferris
188 Vintin Road/ PO Box 46
Carlton, WA 98813
<mferris@centurytel.net>
997-5025

June 13, 2014

To: Perry Huston, Planning Director
Okanogan County

Re: DNS for proposed County Comprehensive Plan

I am writing to express my opposition to the County's Declaration of Non-Significance for the proposed Comp plan and to request that you reconsider this decision and conduct a full EIS on this document before it go to the Commissioners for adoption.

While I understand the desire to expedite a process that has taken many years to reach this point, I believe it would be a dis-service to County officials and citizens not to understand fully the long run implications of adopting such a significant guide to the County's land use future. That is the purpose and function of an the EIS process in this State, to provide a complete disclosure document with opportunity for citizen review of the the significant adverse environmental impacts that may result from adopting this guide to our future and mitigating measures that will be employed to deal with them.

While I fully understand that one of the main objectives of having an updated Comp Plan is to avoid many potential adverse land use and environment issues that could result without such a plan, that fact in of itself does not negate the need to look closely at the issue of residential densities proposed in this plan, particularly for the middle and lower portions of the Methow Valley and the ability of the natural systems, particularly ground water to adequately support this level of development. That is a necessary step to confirm and verify the appropriateness of these proposed densities that exceed currently zoned levels. Such a change could clearly have significant adverse environmental impacts which later could cause the County to commit costly public expenditures to solve them.

My comments are based upon my experience from several perspectives. First as a property owner and resident here since 1987, I have seen a steady decline in our water table and well output over the years and know that adequate ground water resources continue to be a common problem with other neighbors. Second as a retired planning consultant, I have spent many years helping cities and counties and well in preparing Comprehensive Plans and Zoning ordinances over 30 years of practice in the State of Washington. In virtually all cases I can remember, EIS documents were a standard part of the approval and adoption processes in all these jurisdictions. As a consultant, my firm prepared well over a 100 EIS documents, many of those for far less potentially impactful than Okanogan County's proposed Comp Plan. I also was a member of the Middle Valley Citizen Planning Advisory Committee that worked with your staff during 2007-8 to study and provide input to the proposed Comp plan based upon our intimate understanding of the planning and environmental issues facing our area of the County.

While I would like to offer many other comments about the draft plan contents, I will confine my

comments here to the DNS, and hope you will earnestly reconsider this decision. An EIS will clearly add more time to the approval process, but clearly much less time than a further legal challenge.

Thank you for this opportunity to comment.