

Rocky Robbins

From: Isabelle Spohn <isabelle.spohn@gmail.com>
Sent: Thursday, January 17, 2019 11:54 PM
To: Rocky Robbins; Perry Huston
Subject: Scoping Comments: I. Spohn
Attachments: I. Spohn Scoping Comments, 11719.docx

Rocky - Please see the enclosed document with my scoping comments for the 1/18/19 deadline. Can you reply as to whether you have received these?

Thanks,
Isabelle Spohn

January 17, 2019

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Mr. Perry Huston, Director of Planning and Development
Okanogan County
Office of Planning and Development
123 5th Avenue North, Suite 130
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Dear Mr. Huston:

Thank you for this opportunity to submit Scoping comments for the EIS on a new draft Comprehensive Plan for Okanogan County, under SEPA, the State Environmental Policy Act. I am a citizen living in Twisp who owns property in Twisp, in the Lower Methow Valley, and also in Commissioner District 3. I served on the Lower Valley Advisory Group (LVAG) during the time period of 2007-09, regarding inclusion of the Lower Methow into the Methow Review District (now the MVMCPA.)

Please include my comments of October 11, 2017 (Pre-Scoping) as part of the record for this January 18, 2019 submission.

My comments are organized according to the below statutes (Chapter 43.21C RCW) and directives (Chapter 197-11 WAC) The Purposes and Intent of SEPA (Chapter 43.21 RCW) are:

(1) "To declare a state policy which will encourage productive and enjoyable harmony between man and his environment;

(2) to promote efforts which will prevent or eliminate damage to the environment and biosphere;
(3) and stimulate the health and welfare of man; and
(4) to enrich the understanding of the ecological systems and natural resources important to the state and nation.

In order to implement these purposes, the SEPA Rules (Chapter 197-11 WAC) direct agencies to:

- *Consider environmental information (impacts, alternatives, and mitigation) before committing to a particular course of action⁴*
- *Identify and evaluate probable impacts, alternatives and mitigation measures, emphasizing important environmental impacts and alternatives (including cumulative, short-term, long-term, direct and indirect impacts);*
- *Encourage public involvement in decisions;*
- *Prepare environmental documents that are concise, clear, and to the point⁵*
- *Integrate SEPA with existing agency planning and licensing procedure so that the procedures run concurrently rather than consecutively; and*
- *Integrate SEPA with agency activities at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and seek to resolve potential problems⁹.*

A. THE EIS MUST INTEGRATE ANALYSIS OF THE COMPREHENSIVE PLAN WITH ANALYSIS OF THE ZONING ORDINANCE.

The Comprehensive Plan and Zoning ordinance must analyzed concurrently in the EIS. 197-11 WAC: “Integrate SEPA with existing agency planning and licensing procedures, so that the procedures run concurrently rather than consecutively. “ Analyzing both documents concurrently in the EIS will also comply with the additional mandate: “Integration of SEPA with agency activities at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process.”

B. IS THERE A FULL RANGE OF REASONABLE ALTERNATIVES?

There is one obvious and reasonable alternative that is not currently listed in the recent Draft Comp Plan for analysis in the EIS: Change in Comprehensive Planning and Zoning for the Methow Valley, which is under pressure of water scarcity and (related) vulnerability to fire.

An updated and accurate Methow Valley More Completely Planned Area (replacing the 1976 “Methow Valley Plan, An Addendum to Okanogan County’s Comprehensive Plan”) and updated zoning for the MVMCPA (previously the Methow Review District) should include the whole Methow River Watershed - rather than only the northern portion of WRIA 48 , which

is currently defined by the Methow Valley School District boundaries.

This change in boundaries of the MVMCPA should be added to at least one of the Alternatives. The reasons are Historical, Geological, Biological, Water-related, Fire-related, Ease of coordination with other governmental agencies, and Conservation of financial and other resources. Chapter 197-11 WAC states that integrating SEPA with agency activities at the earliest possible time can ensure that planning and decisions reflect environmental values and avoid delays later in the process.

Historical reasons:

*Citizens' Advisory groups and Planning Commission. During the mid-1970's, a major ski resort was being considered for the Upper Methow Valley at Early Winters. Although opposition to the resort began at McFarland Creek in the lower Methow, the development proposal stimulated formation of a citizens' group called the *Methow Valley Land Use Advisory Committee*, which considered only the upper Methow. The committee first met in January, 1975, to help the Planning Commission establish goals, objectives, and policies for the Upper Methow Valley. This group produced "the Methow Valley Plan," an Addendum to Okanogan County's Comprehensive Plan. In terms of zoning, the Methow Review District was written to comply with the goals of the Methow Valley Plan in terms of development.

The proposed ski resort did not materialize, and later in 2007 a citizens' group called the *Lower Valley Advisory Group (LVAG)* met and held citizen meetings regarding

inclusion of the Lower Methow in the Methow Review District (now the MVMCPA.) This was due to citizen concerns regarding the increase subdivision in the Lower Methow and early evidence of over-allocation of water supplies for future development. Due to natural geological boundaries, the LVAG recommended inclusion of the area above Amy's Manor in the Methow Review District. A later compromise with certain large landowners was reached, and the Regional Planning Commission recommended that the Commissioners include the Lower Methow from Black Canyon and further north in the Methow Review District. The commissioners, however, did not follow this recommendation in their approval of the 2014 plan.

Geologic Reasons:

***Geologic boundaries are more sensible for land use regulation than school district boundaries.** The Methow Valley's natural boundaries include the Sawtooth Range, the Okanogan Range, and the Pasayten Wilderness. This area coincides with the boundaries of the Methow Ranger District of the Okanogan National Forest. It makes more sense for land use regulations to use geological boundaries rather than school district boundaries. Having the Methow River basin divided into two different development scenarios is unnecessarily confusing. Consideration of water quantities for population centers would best include the incorporated and unincorporated areas of the Lower Methow (Methow, Pateros) in addition to towns and unincorporated areas of the Upper Methow. The fact that the instream flow of the Methow River is measured in Pateros indicates that Pateros is at end of the watershed.

***Geologic boundaries greatly influence fire behavior,** displayed by fires that have swiftly traveled up and down the Methow Valley in recent years. Mitigations will be easier to create and implement if the valley is considered as a whole.

Reasons Related to Water:

***Watershed:** WRIA 48 includes the whole Methow Valley . The whole Methow River and numerous sub basins are governed by rules of the Methow Basin Plan for WRIA 48. It makes the most sense for boundaries of WRIA 48 to be coordinated with the boundaries of the MVMCPA (previously Methow Review District) regarding both Comprehensive Plan guidelines and Zoning regulations. The WDOE's currently Restricted Basins are all in the Methow River Watershed . It is not only the water availability in sub basins that is important. Once the Instream flow is reduced far enough by measurements at Pateros, junior water rights come under scrutiny for curtailment. Wildlife and humans are dependent upon water and the condition of the watershed as a whole.

Biological Reasons:

***Fisheries:** Migratory species such as salmonids and lamprey travel up and down the Methow River watershed and its larger sub basins. It is simpler and makes common sense to include the whole Methow River watershed in one jurisdiction and would result less

confusion regarding county regulation and development for other cooperating government agencies, citizens, and developers.

***Endangered/threatened species and other wildlife:**

The lower Methow has an abundance of wildlife including a wolf pack, Lynx population, frequent moose appearances including calves and cows, not to mention bald eagles and many more common birds and mammals. The state's largest Migratory deer herd (mule deer) is located in the Methow Valley, including the lower Methow. The deer herd's migration route, fawning and staging areas and winter range are all vital to the herd's survival and most easily analyzed if the Methow river basin goes by coordinated development rules throughout the watershed. It makes little sense to govern sensitive wildlife habitat with different building and development in the lower Methow than in the Upper Methow.

Reasons Relating to Fire:

***Ingress and Egress during Wildfire are best determined by looking at natural geological boundaries and the roads that follow or navigate them.** A transportation plan which would include analysis of primitive and unpaved roads for fire ingress and egress and evacuation routes - dated after the Carlton Complex - is very necessary and has not been done. The Methow Valley is under the jurisdiction of the Methow Ranger District. Of the 1,376 miles of roads all of Okanogan County owns, 726 of those miles (35%) are gravel roads. of these 571 miles are designated as Primitive Roads. Thousands of additional miles of

Primitive Roads are owned by the Colville Tribes, the Washington State Department of Natural Resources, as well as the Bureau of Land Management and the National Forest service. Anything that can be done to make things more simple would be good. In the Methow Valley, such roads are mostly the property of the Methow Ranger District and Washington State DNR. Such coordinating activities with these agencies in determining fire routes will be easiest, less costly, and more timely if the Methow Valley is considered as one unit.

***Fire Behavior:** Geologic, climatic, and other attributes of the Methow River Watershed can be studied as a unit and made it for understanding and planning for fire.

C. THE EIS SHOULD ANALYZE THE IMPACTS OF THE COMPREHENSIVE PLAN AND ZONING CODE UPDATES AND ALTERNATIVES IN RELATION TO THE FOLLOWING ITEMS, IN A MANNER UNDERSTANDABLE TO DECISION-MAKERS AND TO THE PUBLIC:

1. **Distribution of new homes:** A tragedy such as the Twisp River fire should never happen again in our county. Which Alternative best discourages home building in areas of increased risk to firefighters?
2. **Climate-related population growth and locations:** Numerous populations across the globe, including in the USA, have already been forced to relocate due to rising sea levels and other conditions related to climate change. Analyze which Alternative could best assure that affordable and necessary services would be delivered to new

residences in case of unexpected population influx and growth due to human migration?

3. **Air Quality:** 43.21C RCW: One purpose of SEPA is “to stimulate the health and welfare of man.” Analyze the adequacy of supportive language in this document for government planning to reduce health risks such as **breathing wood smoke**. It was formerly true that humans were most exposed to woodsmoke during winter inversions. Now, however, in the age of mega-fires, we breathe it year-round. In fact, in less fire-prone seasons, prescribed burning is being encouraged as a restoration activity. **What mitigations will be considered in order to solve the problem of breathing year-round woodsmoke, and are they adequate? What will be the cumulative impact of woodsmoke upon humans from heating, restoration activities, and wildfire year-round?**
4. **Septic Contamination of Water Supply:** Okanogan County Soils are especially vulnerable to contamination of drinking water from nearby septic systems. See previous Comp Plan comments by MVCC and Futurewise. In the case of lots 5 acres or smaller, how will this be mitigated, and are the mitigations adequate?
5. Use the **most recent and Best Available Science** in analyzing future impacts of this Comprehensive Plan regarding all issues such as fire, water, economy, transportation, and wildlife.
6. What will be the **impacts of incompatible uses** (such as marijuana farms in residential areas with small lots)? Which alternative offers the best protection against incompatible uses and mitigation for these uses?
7. Alluvial fans often offer the illusion of a good building spot, being relatively flat. What supportive language in the Comprehensive Plan will **prevent substantial building and population specifically upon alluvial fans** which may slide again in the future, particularly after wildfire?

8. Which alternative offers the best possibility overall of **rapid egress from neighborhoods during wildfire and the least rate of spread toward most homes? Which alternative best mitigates for more rapid fire movement through shrub-step and grasslands that through forests?**
9. Which alternative has the least negative impact upon **the state's largest migratory deer herd and other migrating species?**
10. One goal of SEPA is "To declare a state policy which will encourage productive and enjoyable harmony between man and his environment." How does this Comprehensive Plan or any particular alternative encourage an increase of **affordable housing** in our county?
11. Which Alternative would best preserve **the quality of water** in drinking supplies and the surface and ground water of our county?

Sincerely yours,
Isabelle Spohn