

## Rocky Robbins

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**From:** Leahe Swayze <leaheswayze@gmail.com>  
**Sent:** Thursday, January 17, 2019 11:15 PM  
**To:** Rocky Robbins  
**Subject:** Comp Plan Scoping Comments  
**Attachments:** Swayze Comp Plan Scoping 2019January.docx

My comments are attached.  
Leahe Swayze

January 17, 2019

Ms. Rocky Robbins, Planner  
Mr. Perry Huston, Director of Planning  
Okanogan County Office of Planning and Development  
123 5th Avenue North, Suite 130  
Okanogan, Washington 98840

Dear Ms. Robbins and Mr. Huston,

Below are my recommendations on the scope of the Environmental Impact Statement (EIS) for the revisions to the 2014 Okanogan County Comprehensive Plan and the zoning regulations.

First, the EIS should analyze both the comprehensive plan and zoning updates as a single action because they are both parts of a larger proposal, dependent on each other for their implementation.

The analysis of each proposed alternative in the EIS should be informed by the most current, widely-accepted climate science. Specifically how will each alternative address predictions for a future that includes reduced snowpack, increased drought, and higher temperatures?

The EIS should analyze the impacts of the comprehensive plan and zoning code update on senior water rights holders, ground water, stream flows (including instream flow rules), and lake levels. If new developments are not required to have a physically and legally available water supply, senior water rights holders and/or instream flows could be adversely impacted. These impacts need to be disclosed and analyzed in the draft EIS with mitigation measures developed.

The EIS should analyze the impacts of the comprehensive plan and zoning code alternatives on emergency services, especially fire protection for firefighters and residents. The Comprehensive Plan and Zoning revisions will have probable significant impacts on fire, police and medical responses. These impacts will differ according to where and how much density is allowed in each alternative. Adequacy of wildfire evacuation routes in new development is critical, as is ensuring that rural roads remain open for wildfire egress as part of county-wide evacuation planning.

The EIS should address impacts of each alternative to air quality, including effects of wood smoke on winter air quality, especially in lower elevation areas where air settles and air quality is especially impaired. The densities and uses allowed by the comprehensive plan and zoning alternatives will adversely impact air quality. These impacts should be analyzed in the Draft EIS and mitigation measures proposed.

Currently there is a lack of review of clearing and grading projects that can result in poorly planned projects, unsightly road cuts on steep slopes, subsequent sedimentation of streams, roads too steep for fire trucks, agricultural land re-grading that creates dust levels that impair air quality, and spread of weeds. A clearing and grading ordinance needs to be developed to reduce impacts of clearing and excavation.

Please include analysis of a Fourth Alternative, as recommended by the Methow Valley Citizens Council. It incorporates measures that will more successfully mitigate adverse impacts of the existing alternatives. The alternative includes up to four Rural designations that recognize areas within the Rural environment with unique attributes, avoid conflicting uses and protect rural assets. It also includes

important provisions in the Methow Valley More Completely Planned Area (MVMCPA) that a) provide for ordinances allowing overlays to limit ridgetop development where subject to high winds, wildfire hazard, and where easily visible from multiple directions, and that require new buildings and parking to achieve Dark Sky compliance in appropriate locations.

Thank you for consideration of my comments,  
Leahe Swayze  
Twisp, Washington