

Rocky Robbins

From: David Kliegman <david@okanoganhighlands.org>
Sent: Friday, January 18, 2019 11:06 AM
To: Rocky Robbins; phouston@co.okanogan.wa.us
Subject: EIS comments for revisions to 2014 Comp Plan
Attachments: 2019 Comp Plan EIS comments.pdf

Ms. Rocky Robbins, Planner I
Mr. Perry Huston, Director of Planning
Okanogan County Office of Planning and Development

The Okanogan Highlands Alliance (OHA) respectfully submits the following scoping comments for the Environmental Impact Statement (EIS) for the revisions to the 2014 Okanogan County Comprehensive Plan and the zoning regulations.

Thank you for considering these comments.

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David Kliegman
Okanogan Highlands Alliance
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January 18, 2019

Sent by email: robbinst@co.okanogan.wa.us

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

Subject: Comments on the scope of the Environmental Impact Statement (EIS) for revisions to the 2014 Okanogan County Comprehensive Plan and Zoning regulations (Comp Plan).

Dear Ms. Robbins and Mr. Huston,

The Okanogan Highlands Alliance (OHA) is a non-profit conservation organization based in Tonasket, Washington, with membership throughout Okanogan County. The sustainability and prosperity of our community is a central concern of OHA's, and it is within that context that we respectfully submit the following scoping comments for the Environmental Impact Statement (EIS) for the revisions to the 2014 Okanogan County Comprehensive Plan and the zoning regulations.

Our comments incorporate by reference the scoping comments provided by Futurewise and the Methow Valley Citizen's Council (MVCC) including MVCC Alternative 4. However, the areas identified for analysis should be expanded beyond what is stated in the scoping notice.

In evaluating environmental impacts, consideration of the likely effects of climate change in Okanogan County is essential. In particular, effects of extreme seasonal variability such as flooding, higher and lower snowpack, increased drought, and higher temperatures should be considered. Seasonal decreased water supply results in increased fire frequency and intensity, both of which are critical factors in evaluating the environmental effects of various patterns of growth and development.

The Okanogan County logo consists of four equal sectors portraying important aspects of the County – mining, logging, agriculture, and recreation/wildlife. Only the first three are emphasized as resource lands in the Comp Plan and there is a large discrepancy in the scope of the assessment. The lack of emphasis on recreation and wildlife in the 2017 review of the 2014 Comp Plan results in downplaying the important economic and other social benefits that recreation and wildlife play in our economy and our quality of life. The scope of the EIS and the revision of the Comp Plan should be expanded to include the role recreation, wildlife, and the natural environment play in the economy and the quality of life in Okanogan County, and how this affects and is affected by the other resource lands in the County.

The assessment should include consideration of the economic cost and benefits of part-time residents and short-term visitors in planning for expected growth. Occupants of seasonal homes, recreational homes, and homes held for occasional use are a significant part of the housing stock in the county but are excluded from population projections. Failure to consider the additional impacts on the natural and built environment, as well as on the demand for services, created by these populations is likely to underestimate the true effects of expected growth.

While the Comp Plan Vision Statement mentions clean air and water, immense public lands, and recreational opportunities, it only considers agriculture, logging, and mining as economic opportunities.

Recreation provides economic prosperity the County, and not just in the Methow Valley. The County, through its Comp Plan, should promote recreation as it does other aspects of the economy. With County support, trail systems throughout our area could increase use by horse, mountain bike, hikers, skiers, birders, walkers, trail runners, and other groups and individuals who visit our area for the natural splendor, instead of the current trend to reduce and abandon these resources.

The EIS should analyze impacts on scenic resources, aesthetics, light pollution, and glare. There is little question that increased development can have significant adverse impacts on the aesthetic quality of the environment. Many people visit or move to Okanogan County because it retains a rural character in terms of growth and development, in contrast to more urbanized areas.

The scope of the EIS should be expanded to incorporate recreation, including hiking, fishing, hunting, kayaking, canoeing, swimming, and birding, and include an economic analysis of tourism. In addition the EIS should assess the degree of compatibility of extractive industries in relation to recreation-based economic opportunity.

As climate change and development continues to shift the delicate balance of resources, it is important that our county act with care and creativity to protect and preserve our water resources and create a vision for our county that is firmly rooted in sustainability.

Okanogan County's 2014 Comprehensive Plan does not adequately consider the amount of water required to effectuate the plan. To allow for responsible growth and equitably manage the water resources shared by county residents, visitors, and ecosystems alike, the County must understand the impacts and tradeoffs and make appropriate adjustments. It is not prudent to zone a large portion of the county as rural high density when there is not nearly enough water to support, or mitigate for, that development. This will only result in environmental degradation, litigation, and personal heartbreak as residents who intend to make homes here are forced to reconcile with the realities of water scarcity. Okanogan County residents have already been affected by this serious problem in developments located in low water areas. We need to learn from past development mistakes and plan intentionally for adequate water supplies moving forward.

One challenge to water management that the county must address is that lack of credible information regarding the hydrology of the Okanogan Valley. Not having a firm understanding of how much water is available, what water can be used efficiently, and what waters are hydrologically connected, is a major impediment to planning for future use and development. The EIS should identify these challenges, discuss the types of inquiries that will be necessary to manage water within the county, and propose a path to obtain the data. The county's current approach to water management relies on anecdotal information and extrapolates unfounded conclusions from pieces of information (e.g. well logs) that alone are not suitable for this purpose and will continue to result in a problematic, piecemeal approach.

Water is a finite resource that is inextricably tied to the county's economic, social, and environmental well-being, it must be used wisely and planned for intentionally. The EIS should analyze the impacts of the comprehensive plan and zoning code update on senior water rights holders, groundwater resources, stream flows (including instream flow rules), and lake levels.

The EIS should examine and disclose the impacts of providing potable water supply to the volume of existing lots as well as the foreseeable impacts if existing parcels were divided into lots as allowed in the Comp Plan. The proposed comprehensive plan and zoning code alternatives do not include any requirement that new lots, new buildings, or new uses must be served by a water source that has a physically and legally available water supply. Allowing the creation of so many lots beyond what the available water supplies can support could lead to serious adverse impacts on surface water quantity and quality, aquatic habitat, and groundwater that must be analyzed in the draft EIS. Mitigation measures need to be included to address these impacts. Failing to require new developments to have a physically and legally available water supply will adversely impact senior water rights holders because the county will apparently continue to allow permit-exempt wells to be used for new developments – even if all of the water in the county is already allocated. This water will have to come from either instream flows or senior water rights holders, or both. These impacts need to be disclosed and analyzed in the draft EIS and mitigating measures developed. The draft EIS should analyze how residents who discover that they don't have

enough water to live in their new homes are impacted when the County fails to require new developments have a physical and legally available water supply.

The EIS should identify and prioritize efficiency in water use. Potential opportunities exist to "save" water through conservation practices, which could then be re-allocated or used for mitigation. The EIS should analyze this potential.

The EIS should include the hydrologic data and appropriate mitigation mechanisms to allow for economic prosperity and environmental protection into the future.

Please include OHA on future opportunities to provide input and participate in a transparent, collaborative process so that the county will develop a durable plan to guide our community into a future of sustainable economic prosperity, resiliency, and environmental health.

Thank you for your attention to these comments.

Sincerely,

A handwritten signature in black ink that reads "David Kliegman". The signature is written in a cursive style with a large initial "D".

David Kliegman, Executive Director