



RE: Comments on DEIS and 2018 Comp Plan revision

August 19, 2019

- 1) The Farm Bureau's position is that we support the 2014 comp plan and how it supports the current zoning.
- 2) The 2018 plan reads like a Futurewise wish list and would read better if references are made to appropriate RCWs. For example, all the requirements under Goal 1 referencing Groundwater are specifically addressed by 6091 and don't need to be spelled out in wish list form. WRIA 49 work group has been formed and is working on mitigation for domestic use and spelling out this wish list may pre-empt the results of the forthcoming plan.
- 3) Maps for Alternative 2-3 do not show Ag Resource lands associated with state and federally owned lands important for crops and livestock grazing.
- 4) Ag lands of significance designation is only on privately owned ag lands in these alternatives and do not have the land uses noted in the 2014 Comp plan section "Rural Resource/Low Density" designated on lines 388-405. This indicates unawareness of the nexus of other commercial or business activities that are non-ag related that are essential in providing added income to local farmers especially small ag producers.

**Not in the 2018 Comp Plan Alternatives 2-4:**

Within the Rural Resource/ Low Density designated area the following uses are priority uses in support of the County's agriculture economy.

- 1) All agricultural operations including raising food or fiber, livestock, feedlots, or the processing of agriculture products. Sale of agricultural products.
- 2) Home occupations and home-based industries providing on-farm, non-farm income.
- 3) Manufacturing activities that are resource based, require proximity to agricultural operations.
- 4) Uses that have historically existed in concert with the priority uses and which can be accommodated in the Rural Resource/Low Density area with special controls include:  
Subarea plans in which rural lands have been designated and allocated in accordance with more specifically detailed plans such as those fostered by Appendices A and B attached hereto.
- 5) Commercial tourism activities with a nexus to agriculture or compatible with off-season periods.

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- 6) Residential uses including vacation rental, all single family, extended family, and farm worker housing.
  - 5) The DEIS does not contain a section which analyzes the cumulative impacts or contribution to the custom culture and effects on economic viability of the county, nor does the Com plan Alternatives 2-3 indicate any assessment of such impacts associated with each alternative. This is a deficiency in the planning process and shows a need for more professional guidance in land use planning especially as it relates to the county's economic viability, custom and culture or the welfare of our populace.
  - 6) Alternatives 2-3 do not recognize the distinct differences between WRIA 48 and WRIA 49 regarding land use and development. There is a noted trend to homogenize the county to WRIA 48 priorities of the Methow Review District
  - 7) The support for Conservation easement, wildlife corridors and land acquisitions need to be conditioned to preserve Resource areas of significance, especially agriculture. It is important that such activities not be allowed to diminish our access to and use of our County Resources by moving lands into protective status or by transferring ownership to public domain.
  - 8) The Comprehensive Plan does not recognize the Volunteer Stewardship Plan developed as part of the Critical Ordinance nor has it considered the contribution of the plan to Ag Viability.

Respectfully Submitted,

Dick Ewing

President Okanogan County Farm Bureau

