

D-101b

Cortney Ingle

From: Jennifer Molesworth <jamolesworth@gmail.com>
Sent: Wednesday, September 18, 2019 10:44 AM
To: Cortney Ingle
Cc: Paul Salladay
Subject: Okanogan Comp Plan comment letter
Attachments: com plan comments.docx

Dear Ms Ingle and Planning Commissioners;

Attached is our comment letter on the Comprehensive plan
Thank you for considering our comments.

Jennifer Molesworth and Paul Salladay
Po Box 1082
Twisp, WA 98856

Okanogan County Planning Commission
123 5th Ave N.
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Okanogan, WA 98840

Dear Ms Ingle and Okanogan County Planning Commissioners,

Thank you for the opportunity to comment on the Okanogan County Comprehensive Plan and Draft Environmental Impact Statement.

The Comprehensive Plan and DEIS are not organized in a way that allows for a meaningful analysis of the impacts of the alternatives presented - and lacks meaningful analysis of the proposed fourth alternative (Citizens' Alternative). As presented, the DEIS is not a helpful tool for decision-making.

I am asking that the county hire a qualified professional to assist in revising the final Plan and Final Environmental Impact Statement. This could be done after the Planning Commission has reviewed public input and provided adequate guidance to inform a new draft. Some elements of Alternative 3 plus the bulk of Alternative 4 could be combined to produce a legally defensible and acceptable comp plan.

Our understanding is that the current plan does not meet the basic standards required by Washington planning laws and does not provide a meaningful difference between alternatives. The proposed plan does not include a Land Use Element which is necessary to guide future zoning and permitting.

The draft plan needs to be revised to address the rapid pace and growing impact of our changing climate and its effects on water supply, wildfire, habitat, etc.

The DEIS does not adequately compare alternatives. Parts of Alternatives 3 and 4, though incomplete in the DEIS, should be considered as the most viable approaches because they: Concentrate most growth closer to towns.

- Take a conservative approach to addressing water supplies.
- Conserve natural resources and promote land uses that support local agriculture.
- Encourage resilience to wildfires and other impacts of climate change.
- Protect wildlife and migration corridors and consider our important mule deer population. Minimize conflict between residential and other uses of Rural lands by creating different designations.
- Improve and enhance recreational opportunities.

In addition the plan needs to be strengthened by updating the following:

Water resources:

Climate change is affecting the timing, quantity and quality of stream flow and water availability in Okanogan county. These impacts will continue to worsen and now is the time to address them.

The Comp Plan fails to commit to assist in achieving instream flow rules as required by law. This requires acknowledging that excessive growth and use of groundwater will have a

detrimental effect on instream flows, which are not now being met and will only get worse without some constraints. While the draft acknowledges the need to ensure adequate water for towns and urban growth areas, it is vague on how that will be accomplished. The comp plan needs to be more specific on what incentives will be provided to prevent sale of water rights to buyers outside of the County.

Excavation, Clearing and Grading:

A lack of permit requirements for excavation, clearing and grading leads to poorly planned and often inappropriate impacts to land, wetlands, and floodplains in Okanogan County which then leads to neighbors going against each other. Common sense approvals before excavation, clearing and grading occur will promote harmony and better protection for land, air and water.

Okanogan County is one of the few in the state without a GCE ordinance and the Comp Plan is the logical place to commit to such an ordinance.

There is no regulation or permit for, and virtually no environmental review of, excavation and grading projects in Okanogan County. Existing exemptions from environmental review of excavation and grading projects presumes a County ordinance which does not exist.

Reasonable review and regulation of excavation, clearing and grading will reduce sedimentation in streams from erosion; reduce runoff and potential for flooding; reduce the number of roads too steep for fire-fighting equipment; reduce dust from agricultural re-grading that impairs air quality; and reduce unforeseen environmental and visual impacts from such projects. The goal of this element would be to protect water and air quality, improve fire access, and reduce visual and other impacts from excavation, clearing and grading activities and projects.

Land Use Elements:

There should be a general planning goal to support planning that minimizes siting of incompatible uses.

There is no Land Use Element to play the central role in guiding land use patterns and decisions for the County. There is only one Rural designation that refers everything at a project-specific level back to “underlying zoning.” In most cases, “underlying zoning” is merely a minimum acreage, with no reference to the characteristics of the area (e.g. residential, industrial, range lands) or distinction between allowed uses – everything is allowed everywhere in the Rural designation, unless someone decides at a site level that it shouldn’t be. This has led over time to incompatible uses being sited adjacent to one another with resulting community stress. Examples: Cannabis farms across the county; Gravel pits and party venues sited in rural neighborhoods.

Wildfire:

Climate change and fire suppression are making our fire prone landscapes even more so. The comp plan fails to commit the County to require less-flammable materials in new construction. While the right to build a home with flammable materials is valued by some, such decisions affect us all. These homes can accelerate the spread of wildfire or make it difficult to control a wildfire, thus endangering neighbors and firefighters. Most of the landscape in the county is

fire dependent with frequent fire intervals as a natural condition – historically these landscapes experienced frequent, low intensity fires that kept fuel loads low. Fire suppression and climate change allowed mega fires like the Carlton Complex - which burned through over 60 years of fuels accumulation in the shrub steppe. Siting homes in fire prone settings requires that they be fireproof to protect fire fighters, homeowners and the environment. Requirements for fireproofing homes would also allow for fuels management using fire as one more tool to reduce fire severity and maintain a healthy environment.

Fish and Wildlife Conservation:

Future changes in climate are expected to have significant impacts on fish and wildlife habitat. These will include warmer and drier summers, earlier and longer periods of low summer stream flow, higher winter stream flows, and more frequent and intense natural disturbances (e.g., wildfire, floods, landslides). Each of these changes will affect rivers, streams, floodplains and the plants and animals that county residents depend on for the health of their communities. Okanogan County should revise this plan to incorporate the best available science to adapt to these changes and adopt policies that maintain the diversity and integrity of natural ecosystems in Okanogan County.

Critical Areas Ordinance (CAO): Okanogan County is relying on the 1994 CAO, which is grossly deficient having missed two mandated updates. How can critical areas such as wetland, aquifer recharge areas, fish and wildlife habitat, frequently flooded areas, and geological hazards be protected (and protected from) if not identified and designated using the latest information? The comp plan should commit the County to updating the CAO with the adoption of the comp plan, and to amending the Shoreline Management Program and comp plan to be consistent with the revised CAO as necessary

We appreciate the effort that you are all putting into this endeavor and hope that time and resources can be committed to re-work the comprehensive plan to best need the current and future needs for the residents of Okanogan County.

Thank you for considering our comments.

Sincerely;

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September 17, 2019