

Cortney Ingle

From: Steve Ralph <sralphenviro@gmail.com>
Sent: Wednesday, September 18, 2019 3:43 PM
To: Cortney Ingle
Cc: DeeAnn; Lorah Super
Subject: Comments on the Ok. Co. Comp Plan
Attachments: Comments to OK Planning Commission on Comp Plan Sept 18 2019.docx

Ms. Ingle,
Attached please find my comments on the draft Comprehensive Plan, directed to the Planning Commission.

Best regards,

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Okanogan County Planning Commission

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As a citizen of Okanogan County, I deeply appreciate the efforts of the Planning Commission to help guide the County in planning efforts to address the future needs and capacity of Okanogan County to effectively deal with stewardship of our collective land and water resources. This guidance is essential to help guide the elected commissioners so they may make informed decision with respect to the components of the Comprehensive Plan now under development.

I am submitting these comments on both the Draft SEPA EIS and the Comprehensive Plan currently being considered for adoption by the Okanogan County Commissioners.

Draft SEPA EIS:

The Draft EIS in its present form, is inadequate to support development of a comprehensive planning document. The description of the relative impacts (both positive and negative) specific to each alternative is poorly written and vague, and isn't helpful in understanding the consequences of each alternative. It does also include consideration of the important suggestions included in Alternative 4.

The DEIS fails to do its job, which is to help the public and decision makers come to an informed decision as to the merits of the alternatives across a range of important planning issues. However, I would rather see scarce County resources go to improving the Comp Plan than doing a major overhaul of the DEIS at this point. The devil is in the details of the plan, and weight should be given to filling those deficiencies rather than noodling with the DEIS.

Comprehensive Plan as currently presented:

The Draft Comprehensive Plan is poorly organized, largely unintelligible and fails to comply with what is required by law to both inform the public of the objectives and outcomes associated with land and water management in the near future. Glaring omissions include no discussion of a Land Use Element or a thoughtful community wildfire preparedness plan.

Among its many shortcomings, there is little or no consideration of significant resource elements, including but not limited to water resources (including stream corridors, wetlands and shorelines), air quality, fish and wildlife habitat, critical area ordinances, and preparation for wildfires, clearing/grading/excavation, and many others. There are useful sections in the plan, but with so many shortcomings and topics not even mentioned, it is no adequate to inform neither the public nor our elected officials on what needs to be considered. Given that this process for a comprehensive plan has languished for over 5 years, during with the County planning staff has not been able to produce a credible plan, it is now the time to hire a competent professional to take on the task of writing a comprehensive document that meets the spirit and intent of the law, and that allows the commissioners to base their future decisions on fact rather than conjecture.

One can only conclude that after five years of effort, the planning staff simply does not have the in-house capacity to pull together a credible and thorough plan to guide the county on important land and water issue for the next decades. This is understandable, as it is a challenging task. It seems that the time has come to hire outside consultants to take what has been done so far, add importing missing pieces and bring the document to a conclusion that citizens can feel confident captures the needs of the County. Some elements of Alternative 3 plus the bulk of Alternative 4 could be combined to produce a legally defensible and acceptable comp plan.

The comp plan needs to consider the following elements:

Water & Water Resources – The plan is vague on how it will assist in resolving issues regarding future use of surface and ground water withdrawals while achieving instream flow rules, especially in the Methow Valley. Past practices have resulted in depletions of instream flows that thwart attainment of required instream flows at certain locations and times of year. Ensuring adequate water for inevitable demand placed upon water resources by growth is an important responsibility of the County. In addition, the comp plan needs to be more specific on what incentives will be provided to prevent sale of existing water rights to buyers outside of the County, so that these resources may be reserved to accommodate growth in the County.

Recreation -The comp plan as currently written is nearly silent on recreation, a required element pursuant to the Planning Enabling Act. The County can play a key role in preserving and enhancing recreational opportunities through direct support and in a coordinating role in encouraging open space, trails, and the like. This could be an important economic driver in other parts of the County where is currently is not. All citizens of the county pay taxes in support of this important public benefit, and the comp plan needs to reflect the importance of recreation to the enjoyment of its citizens and to development and expansion of the recreation based economy.

Air Quality - Air quality is becoming a serious issue, especially in the winter and summer months, and we need a thoughtful plan to address it proactively. The County can help by providing incentives for new homes to heat with alternatives to wood stoves, and financial assistance to allow upgrading of old stoves with newer, cleaner burning ones. A community clean green composting facility would encourage homeowners to recycle green waste rather than burning it, which would both improve seasonal air quality but have the added benefit of reducing the need of local fire districts to respond to dozens of out-of – control burn piles each spring and fall.

Community Wildfire Preparedness - The County should provide incentives for new construction and retrofit of older homes to use less-flammable construction materials, build in defensible space around homes and ensure that driveways and approach roads are sufficiently wide to allow fire response vehicles to safely enter and leave properties during fire suppression activities. Also, see comments about the importance of keeping rural roads open and available to the public to allow safe evacuation in the event of wildfires.

Grading, Clearing, and Excavation (GCE) - The County currently provides few restrictions on grading, land clearing and excavation, the consequences of which can directly and indirectly impact water

resources and fish habitat through erosion and deposits of fugitive dust. At present the comp plan is silent in dealing with the impacts from unregulated GCE. A GCE ordinance could be a means of ensuring that new roads and driveways are adequately sized to accommodate emergency and fire vehicles. 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.

Methow Valley Review District – There should be some recognition and provision to move forward with the “more completely planned areas and sub-units” to accommodate the special circumstances with certain sub-units of the County, and formally organize advisory committees to move forward with specific planning. The Methow Valley Citizens Council has provided specific language on goals and recommended policies that the Planning Commission should consider endorsing.

Critical Area Ordinance – The current ordinance dealing with critical areas has not been updated since 1994, and is not in compliance with current regulatory requirements. As a result, critical areas such as wetlands, aquifer recharge areas, fish and wildlife habitat, frequently flooded areas, and geological hazards are not adequately protected simply because they are not officially accounted for in base maps and delineations compiled by the County. These deficiencies need to be resolved using the best current available information. The comp plan should commit the County to updating the CAO within six months of adoption of the comp plan, and to amending it and the Shoreline Management Program to be consistent with current required standards.

Ridgetop development & dark sky - The comp plan should recognize that some communities place a high values on unobstructed night skies, and wish to adopt ridgetop development restrictions, while others may not. For those communities that do wish such restrictions, the County should commit to adopting development restrictions to carry out the wishes of the communities. At present, there are no such restrictions.

In conclusion, thank you on the Planning Commission for their work on this important revision to the long overdue Comprehensive Plan.

Sincerely,

Stephen C. Ralph

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