

**Cortney Ingle**

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**From:** Isabelle Spohn <isabelle.spohn@gmail.com>  
**Sent:** Thursday, September 19, 2019 9:31 AM  
**To:** Cortney Ingle  
**Subject:** Spohn Comments on Draft EIS  
**Attachments:** Final Spohn Comment on DEIS 9\_19\_19 2.docx

Cortney - Here are my comments on the DEIS. Please advise when you receive. Thank you ~

Isabelle Spohn



September 18, 2019

From: Isabelle Spohn, Box 24, Twisp, Wa. 98856

To: Okanogan County Regional Planning Commission  
Electronically transmitted to: from:cingle@co.okanogan.wa.us

Dear Planning Commissioners:

Thank you for your service to the community and for this opportunity to comment on the Draft Environmental Impact Statement dated 7/17/19.

My comments follow:

**1. Additional public review is in order after the Comprehensive Plan and Draft EIS are re-written, as planned by the county - at which point it will hopefully become comprehensible.**

My understanding is that the county plans to contract with a consultant who would re-write the Comp Plan/DEIS for purposes of compliance with the law and understandability. If this is done, I submit that the DEIS should once again undergo a public comment period with verbal and written testimony accepted by the County.

This document is not a DEIS. It is a rambling essay, describing what has occurred, should have occurred or might occur in the county with obscure cross-references and attached documents that are out of date. It substitutes quantity for substance. The public and decision makers deserve something understandable and to the point to inform their decisions and comments.

**2. The DEIS does not comply with SEPA:**

\*The DEIS does not adequately inform the decision-makers or the public regarding impacts upon the environment so they can make informed decisions regarding the Comprehensive Plan. It does not include the necessary zoning ordinance, which was mandated by the Superior court - because it has not yet been written. Ample time for the county's required review was allowed, but it was not done and so cannot be analyzed as necessary in the DEIS.

\* The Comprehensive Plan is so full of 1) outdated documents (Methow Valley More Completely Planned Area, with data from the 1970's, which is missing pages and displayed upside down on the website, requiring page-by-page reorientation) - and 2) missed deadlines (for example, Critical Areas Ordinance and zoning ordinance) - that an adequate analysis of impacts is virtually impossible. The County's Primitive Roads Study (Aka Backcountry Roads Study) is not a part of the Comp Plan. In what way does the county intend to support (or not support) ingress/egress during fires in relation to this study? Which Alternative would have the fewest impacts upon fire safety for the public? What could be the impact upon human life of

closure or vacation of these roads, which are important escape routes? The Comp Plan sets for no guiding policy for formulation of plans after completion of the Primitive Roads study.

**3. The DEIS fails to address important issues brought up in the Pre-scoping and Scoping process.** For example, I myself submitted the below comment for the 10/13/17 “Pre-scoping” period in regards to recent large wildfires and air quality. It has not been addressed in the DEIS:

*10/13/17 Spohn Pre-Scoping Comment on Air Quality: What are the goals of the Comprehensive Plan for the increasing threat from wood combustion?*

“Air quality is emerging across the West as a serious health problem, in view of increasing wildfire activity. But accompanying the wildfire issue, there is also a demand emerging for more forest “management” in terms of increased logging and thinning of public lands. Along with increased logging and thinning come increased slash that must be somehow removed - or it merely increases the danger of wildfire. One major practice is to remove this slash through burning piles of logging/thinning debris.

“How will this be done without increasing woodsmoke in the air, increasing the huge amount of woodsmoke residents are now breathing from wildfire? What alternatives can be explored? What support or direction does the Comprehensive Plan give for any potential mitigations in the face of these difficult problems that are now facing public health and resource management? What are the goals of the Comprehensive Plan for protection of its citizens in relation to air quality that is acceptable for a healthy life?”

This issue is still not addressed in the DEIS, nor are other issues with existing goals evaluated as to effectiveness or environmental impact.

**Ground Water Quantity:** The DEIS does not address the impact of **lines 562-63** in the Comprehensive Plan: “*Promote the re-issuance of water rights lost through relinquishment within Okanogan County.*”

Such a practice (except upon occasions of unusual hardship, such as destruction of a home by fire and inability to rebuild within 5 Years) would create havoc in the county. In one case I know of, a homestead dating back to 1921 went through several periods of over 5 years during which no water was used. Yet in later years, the land was subdivided into 7 parcels, and a creek on the property was being run dry by new landowners on the old, once-existing farm. Eventually, the right was properly relinquished; but WDOE did allow the landowner at the old farm site to irrigate an acre. Should the right be restored to all or any of the landowners now, the creek would be drained dry again. What would be similar impacts, county-wide, of restoring relinquished water to previous owners? **This issue is not addressed in the DEIS**

**Ground Water Quality:** much soil in our county is especially subject to septic contamination, and dense development exacerbates the problem. Concerns about this issue have been made repeatedly in citizen comments (see previous MVCC comments) regarding the Comprehensive Plan. **They remain unaddressed in this DEIS .**

**Climate Change:** Although many citizens listed the county's response to climate change as a concern during Scoping,, this topic is barely addressed in the DEIS. Shouldn't the DEIS analyze the environmental impact of the county's decision to take no action on this front? For example, it has been suggested that the county look into setting aside properties in the city expansion areas to accommodate for possible human migration that is just beginning in some areas of our own country due to rising sea level, fire, floods and other disaster? There is merely this statement: "This EIS (draft) will not attempt to assess specific impacts brought about by climate change nor analyze any approach to reduce the impacts." **Thus climate change is not addressed.**

**\*Treatment of wildfire and climate change :** This section is superficial, has little factual basis for its claims, and ignores well-established and well-researched information by experts in the field. It is merely a recitation of possible mitigations that could have/should have been, or may be, implemented by the County in the past or future. (The same is true of other sections of the DEIS. )

**For example:** DEIS p. 38, "Wildfire and climate change" states: "But given that fires have been equally destructive to both remote rural and higher density urban and suburban areas, it is reliance on building codes, fire wise construction, landscaping and on-site discipline, rather than zoning which will more effectively address the fire related issues in the county."

The above statement directly contradicts the statements of the American Planning Association that "coordination of the various elements in a Comprehensive Plan is often the "missing link" in wildfire plans. In 2005, The American Planning Association published Planning for Wildfires (Planning Advisory Service Report Number 529/530) which states that one significant finding of this report regarding important strategies for development is "An examination of the relationship of lands in the WUI (Wildland Urban Interface) to land-use, community facilities, and transportation proposals in the other elements of the comprehensive plan to ensure there are no conflicts and the elements are mutually supportive. This particular component is the missing link in many of the wildfire plans reviewed by APA. For example, land-use designations of one or two acres in areas prone to wildfires are certainly going to cause conflicts. Similarly, transportation routings that do not allow multiple access points into and out of a developing area or are inadequate in width are another." (p.80)

What is the environmental impact of ignoring such expert opinion? **We do not find it in this DEIS. Wildfire issues are not adequately addressed.**

The above-mentioned lack of coordination is precisely the defect that remains unanalyzed in the Draft EIS. The DEIS refers to documents that are have not been incorporated into the Comprehensive Plan. Instead of analyzing the impacts of the Comp Plan, the DEIS lists things that should or could be done. The section on wildfire is merely a recitation of possible mitigations that could have, or should have, been implemented by the county in the past or future. **It is not an analysis of the Comprehensive Plan nor an analysis of which alternatives would have more or less environmental impact.**

**Economy:** The DEIS fails to analysis the economic impacts of each Alternative upon the welfare of the population and of the county. **What are the consequences of not addressing the Economy?**

**Affordable Housing and Homelessness:** The DEIS fails to analyze which Alternative will deal best with these increasingly important issues in our County. **The Comp Plan has no stated goals on this topic. What are the consequences of this?**

Sincerely yours,

Isabelle Spohn