

Cortney Ingle

From: Mary Yglesia <maryyglesia@gmail.com>
Sent: Thursday, September 19, 2019 10:50 AM
To: Cortney Ingle
Subject: Draft Comprehensive Plan Comments
Attachments: Alternative-Four-Final-Feb-2019.pdf

Dear Planning Commission,

Thank you for extending the comment period for the Okanogan County Comprehensive Plan (CP). This project has been languishing for far too long and to the detriment of the citizens of this county, the environment and the county itself having now to defend lawsuits that may have been prevented with a well crafted CP in place.

Comments:

Draft Environmental Impact Statement (DEIS):

The DEIS is inadequate and fails to accomplish the goal of providing information that would allow the citizens and county staff to make decisions.

Comprehensive Plan:

I found the draft CP almost impossible to decipher. It is poorly written and missing key elements that would provide the Commissioners and county officials with the guidance needed to create policies and rules. I ask that the county hire a trained, experienced professional for the revising of this critical, foundational document. This work requires someone who knows how to do it and it is unfair to expect the volunteer Planning Commission or the County Commissions to have the appropriate expertise to construct a thoughtful, thorough and strategic CP.

I want to join the more than 200 citizens who have supported the consideration of Alternative 4 as put forth by Methow Valley Citizen's Council (attached) and believe that elements of Alternative 3 and 4 would be a perfect place for an experienced professional planner to begin revising the CP.

Vision Statement:

The value of a well written vision statement cannot be overstated. As the CP is a guiding documents for making rules and policies, the vision statement should be the lens through which the whole of the CP should be viewed. All elements of the CP should meet the stated vision! Before anyone gets lost in the weeds of this planning document, the vision statement must be revised! The so-called vision statement of the draft CP is laughable. It is in no way a vision statement. Please compare the county's statement with that of the Lower Methow Advisory Group's done in 2008.

Draft CP vision statement:

Okanogan County's vast land mass, clean air and water, immense areas of public land, diverse recreational opportunities and long traditions of farming, ranching and use of natural resources lends itself well to a rural lifestyle. Planning efforts should be made to promote this lifestyle, but also to look to the future to create and cultivate new economic opportunities which would create a robust and sustainable economy so that future generations may flourish.

Lower Methow Valley Advisory Group vision statement:

In the next 20 years, the community of the Lower Methow Valley will be a model for people living in harmony with their environment, a community where people's needs for services, social interaction, agriculture, business, housing, recreation and education are in balance with the ecosystem we inhabit. By carefully blending

the natural, human and economic environments, we will pass on to future generations a landscape as rich and beautiful as the one we now enjoy.

It is of great value to the residents of the Lower Methow valley to protect the many benefits of a low population density in a small, well-defined area of tremendous natural beauty still possessing clean air, clean water, natural and working forests, small scale agriculture, open fields and abundant wildlife. Each of these elements is an important part of the whole and serves to preserve both the peace of mind that the quiet of the valley encourages and the rural quality of life so treasured by its residents. The freedom to exist and support oneself here, to move amid the open space and to trust one's neighbors are of paramount importance to the citizens who embark upon this planning process and the filter through which we consider and address future development.

The vision from the advisory group is clear. It has heart. The draft CP is heart-less.

Regional or sub-areas for comprehensive planning:

Okanogan County is a large and diverse county. The needs of the Aeneas are not the same as those of Pateros just as Mazama is not the same as Oroville or Conconully or Chesaw. The one-size-fits-all approach does not do justice to the wide range of land uses, economic bases or availability of water.

I support using a structure much like that used in Chelan County to identify sub-areas or regions within our county and put into place formal structures of local advisory groups whose purpose would be to represent the constituents off their region and provide information to the Planning Commission and the Commissioners.

I understand that there was some attempt at this in year's past but the efforts of those hard working and well intentioned volunteers was dismissed. The disrespect shown to these groups has led to very hard feelings in our community and a lack of trust in the County's governance. This loss of trust must be healed before there can be true goodwill between County staff and the citizens for whom they are supposed to be representing.

I want to thank the Planning Commission for their hard work and for visiting us in Methow on multiple occasions attempting to provide us with information. Their efforts are true public service.

Sincerely,

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Alternative Four

We propose a fourth alternative that we believe would result in fewer significant adverse environmental impacts. Some provisions of the proposed alternative apply county-wide, and a few apply specifically to the Methow Valley watershed, including the lower valley to the mouth of the river as well as the Methow Valley More Completely Planned Area (MVMCPA), formerly the Methow Review District (MRD). This alternative of the Comprehensive Plan proposes policies that reflect the geographic and cultural diversity of Okanogan County and informs further detail to be provided in Zoning, Subdivisions and other implementing regulations.

Summary

Alternative 4 designates Resource Lands to indicate areas where the County will promote long-term, commercially viable agriculture, forest, and mineral uses and will discourage intensive residential, commercial, and industrial development. Larger lot sizes are implemented in the resource designations to avoid conflict with agricultural operations. The city expansion areas are designated in Alternative 4. This alternative includes up to four Rural designations (e.g. Residential, Resource, Transitional, Remote) to recognize areas within the Rural environment with unique attributes, avoid conflicting uses, and protect rural assets. Unlike Alternatives 1-3, which rely heavily on underlying zoning for guidance, Alternative 4 applies policies in the Comprehensive Plan describing each Rural land use designation, its intent, the densities and types of uses allowed.

Alternative 4 relies on the cities and towns and their expansion areas to serve most of the population growth and supports them in acquiring adequate water for future growth. Alternative 4 uses regulation and incentives to promote the consolidation of non-conforming lots to achieve a higher portion of larger lots in the rural areas. Alternative 4 provides adequate detail in the Comprehensive Plan policies to direct growth at a large scale, while recognizing the supportive role of other regulations such as Zoning, Subdivision Ordinance, Building Code, CAO and SMP in making land use decisions on a site-by-site basis. Finally, Alternative 4 provides policies that address water quality, water quantity, wildfire protection, Critical Areas, excavation and grading, air quality, public land and aesthetics.

Discussion

A. County-wide Provisions

Water Quantity

Harmonizing watershed and land use planning, ensuring legal and physical water availability, and protecting instream flows and senior water rights holders are critically important objectives of the Comprehensive Plan.

Preventing the sale of water rights to downriver development interests outside of the county is an important step toward achieving those objectives. Doing so would benefit county watersheds and allow for more options to support local agriculture, appropriately sited development, and to maintain and enhance fish and wildlife habitat and instream flows. This alternative includes the following specific measures to achieve these objectives:

- Encourage and support efficient water use and transfer of saved water to towns and designated growth areas and to maintain and enhance fish and wildlife habitat and instream flows.
- Discourage the transfer of water from agricultural and industrial uses to rural residential development outside of towns and designated growth areas.

- Approve only developments that comply with the adopted instream flow rules for each watershed.
- Support water banks and exchanges to allow development in designated growth areas where water is not legally and physically available consistent with instream flow rules, fish and wildlife habitat needs, water law, and consistent with adopted land use plans and zoning ordinances.
- Support establishment of water banks or exchanges, administered by independent non-profit entities, that can buy or accept water in trust for reallocation for agricultural or residential purposes within the County.

Water Quality

- Scale density and land use to protect surface and ground water quality.
- Limit impervious surfaces and require vegetation retention to filter and infiltrate storm water runoff.
- Require septic system design that will protect groundwater, especially over aquifer recharge areas.

Wildfire Protection

Wildfire will continue to threaten and destroy homes in the county, and especially in the Wildland Urban Interface areas. The insurance sector may refuse to insure some dwellings or raise rates so high that homes become uninsurable. While personal responsibility is an essential part of fire prevention, county government has an important role in land use planning so that risk to families and first responders is reduced.

- Adopt an appropriately scaled modification of the International Wildland Urban Interface Code, to address new subdivisions, new roads and new building permits.
- Support programs that provide incentives to retrofit and “harden” existing homes and subdivisions in high risk areas.
- Update the Community Wildfire Protection Plan with meaningful actions to reduce risks to life and property.
- Areas with one-lane roads or only one way in and out, and areas where the fire districts do not have the ability to serve more development, will be designated and zoned for the lowest rural densities or as Natural Resource lands.
- Primitive and remote gravel road rights of way will be retained by the county and designated for fire escape routes and public land access.

Rural Designations

Lands designated as Rural Lands include lands suitable for different kinds of uses, including residential development, limited commercial services, agriculture, and rural living. This alternative includes up to four Rural designations (e.g. Residential, Resource, Transitional, Remote) to recognize areas within the Rural environment with unique attributes, avoid conflicting uses and protect rural assets.

Unlike Alternatives 1-3, which rely heavily on zoning for guidance, this alternative applies policies in the Comprehensive Plan about each Rural land use designation, its intent, the densities and types of uses allowed. It provides clear policy guidance for development of the implementing zoning ordinance.

- The existing mix of agricultural and resourced based activities, recreation, and tourism are recognized for the diversity they provide to the economic base. A mix of residential densities should be allowed to provide an adequate inventory of housing sites for those seeking a rural lifestyle and to provide worker housing in proximity to employment providers.

- Each designation will recognize the varied attributes of the rural landscape that determine the land's ability to support residential density and other land use activities.
- Each designation will assign appropriate density as well as permitted and conditional uses to avoid incompatible and nonconforming use conflicts.
- The District Use Chart in the zoning code will be amended to harmonize compatible uses with permitting requirements.

Critical Areas

- Update the Critical Areas Ordinance within six months of passage of the zoning code.
- Amend the comprehensive plan to incorporate the updated CAO as soon as it is complete.
- Protect Aquifer Recharge Areas: areas that have a recharging effect on aquifers that provide drinking water shall have a density of no more than one dwelling per five acres outside urban growth areas.
- Maintain wildlife corridors when creating new lots.

Excavation and Grading

There is no permit required for, and virtually no environmental review of, excavation and grading projects in Okanogan County. This lack of review can result in poorly planned projects, unsightly road cuts on steep slopes, subsequent sedimentation of streams, roads too steep for fire trucks, and agricultural land re-grading that creates dust levels that impair air quality.

- Provide for adoption of a Clearing and Grading ordinance to reduce the impacts of clearing and excavation.

Agricultural and forest land conservation

Agricultural land conversions impact the rural character of the county, as well as reducing incomes and employment provided by local farming and ranching and increasing reliance on outside sources of food and other agricultural products.

- Designate as agricultural and forest land of long-term commercial significance land that is used for agriculture and forest, that is not used for urban development, and that has long-term commercial significance for these uses.
- Lands designated as Resource Lands indicate areas where the county will promote long-term, commercially viable agriculture, forest, and mineral uses and will discourage intensive residential, commercial, and industrial development.
- Support state and federal incentives to conserve farmland including voluntary, market-based conservation easements.
- Support additional incentives to conserve farm and forest land.

Air Quality

The Okanogan and Methow Valleys regularly experience impaired air quality caused by wood stoves and open burning. Poor air quality is most apparent in the winter from uncertified wood stoves, and in the spring and fall from open burning.

- Provide incentives to heat new homes with devices other than wood stoves, especially in airsheds that experience poor winter air quality.

- Encourage programs that assist-low income residents of the airshed to convert from uncertified stoves or fireplaces to pellet stoves, propane, certified stoves, or other affordable heat sources that do not cause air pollution.
- Discourage open burning and support alternatives such as making neighborhood chipping available for a modest fee.

State Land Purchases

State lands are an important resource for recreation and grazing, contributing to the economy of the Okanogan County with opportunities for hunting, fishing, birding, skiing, mountain biking, and other activities. In Okanogan County, residential tax revenues cover only about 7% of the cost to provide services to new dwelling units. Land purchased by state agencies and land trusts save the county and other local governments substantial amounts of money in avoided costs for services. The county also receives some payments in lieu of taxes for state conservation lands. Land purchases by state agencies and land trusts are agreements between willing sellers and willing buyers.

- Support state land purchases from willing sellers when the purchase will reduce costs for the county and other service providers and protect fish and wildlife habitats, maintain or enhance public access, or provide other public and community benefits.

Recreation

Many areas of Okanogan County rely heavily on the tourist industry, which is directly reliant on recreational opportunities and the natural beauty of the area. Both residents and tourists benefit from the county's recreational opportunities and natural amenities. Open space is an important component of the natural environment and supports natural systems, aesthetic, recreational and economic resources in the rural landscape.

- Open space land in Okanogan County is minimally developed land including critical areas, parks and recreational land, wildlife corridors, historic sites, resource lands and conservation areas.
- Specific sites should be identified as an important part of the parks, recreation and open space system, based on public interest or on the need to ensure the integrity of overall open space corridors.
- Identification, mapping and additional research will continue over time to identify and support parks, recreation and open space corridors.
- Okanogan County's vision is to provide a mix of parks, recreation and open space that complements community character, creates diverse opportunities for residents and visitors, and preserves ecological functions.
- The County will focus on creating connectivity to existing opportunities, developing partnerships, and coordinating the process at the regional scale for the many planning activities that are cross-jurisdictional. Access and connections to the many federally owned lands are a vital aspect of the overall park and recreation system.

B. Methow Valley Watershed Provisions:

Since the adoption of the original Methow Review District, the Methow Valley from Early Winters to Gold Creek has been zoned for less density than the rest of the County. This has resulted in higher land values generally, and an influx of new full-time and part-time residents enjoying recreational opportunities and a rural lifestyle. The lower Methow from Gold creek to the mouth of the river is an

integral part of one watershed, with the same rural qualities of open space, working lands and scenic views supporting the valley's tourism economy. To preserve this economic engine for the county in the face of increased growth, the following provisions should be incorporated into the comprehensive plan and zoning Code.

Respect the public process when designating and zoning land

In 2014, three properties in the Methow Valley More Completely Planned Area (MVMCPA) were rezoned to higher densities without adequate public notice or opportunity for public comment. The stated justification was to make zoning density within parcels consistent when zone maps split a parcel. Rather than conform all properties to the lower density zone (R-20), they were conformed to higher densities (R-5) without adequate public notice and without evidence that water is physically and legally available to support higher densities.

- Restore Rural designation (and underlying zoning) of these properties to R-20, the density the public understood was going to be adopted.

Ridge-top Buildings

New homes built close to the edge on ridge tops are often in harm's way, subject to extreme winds, wildfire and other hazards. These homes and their outdoor lighting also interfere with natural aesthetics from many directions, often from miles away.

- Provide for an ordinance allowing overlays to limit ridgetop development in appropriate locations.

Outdoor Lighting/Dark Skies

The Methow Valley has prided itself on maintaining a rural atmosphere, where lighting does not impair views of the dark night sky or glare into the homes of others. Increased development in towns and rural areas has brought an increase in light pollution, and the problem will only worsen with development expected during the coming years. The Dark Skies initiative, which has been embraced by the Okanogan County Electric Cooperative, is a simple way to increase awareness of and reduce light pollution issues.

- Provide for an ordinance allowing overlays that require new buildings and parking to achieve Dark Sky compliance in appropriate locations.

