

Cortney Ingle

From: DeeAnn Kirkpatrick <deeannkirk@gmail.com>
Sent: Thursday, September 19, 2019 4:17 PM
To: Cortney Ingle
Cc: ANDY HOVER
Subject: Comments on Comp Plan and DEIS
Attachments: DK comp plan comments.docx

Attached please find my comments on the Comp Plan and DEIS

Thank you for the opportunity to have this input!

DeeAnn Kirkpatrick

Date: September 19, 2019

Dear Ms. Ingle and Planning Commission:

Thank you for extending the comment period for the Okanogan County Comprehensive Plan (Comp Plan) and Draft Environmental Impact Statement (DEIS). It is important for Okanogan County citizens and future generations, that the County has an easily understandable Comprehensive Plan and Draft Environmental Impact Statement. Each document must meet State legal standards, and the DEIS must clearly analyze the differences and effects associated with the alternatives considered. To achieve that end, I agree with the Planning Commission that a qualified land-use attorney or land-use consultant should be hired to help sort out the current deficiencies and overlooked issues in the documents as described below.

Comp Plan

The draft comp plan has been described in the Methow Valley News as “disorganized and confusing”. The article describes the Planning Commission’s initial list of omissions and inadequacies as: a section on land use, water resources, wildfire protection, recreation, and affordable housing. I support including a robust discussion of these elements in the Comp Plan. As well, I would suggest that the Planning Commission make full use of the Methow Valley Citizen’s Council’s 12 Issue Briefs (provided in their comment letter) to fill in these and other missing or inadequately described issues. Some of the most important issues are outlined below.

Land Use: This vital element is missing, although disconnected land use discussions are spread throughout the document.

Water Resources: As required by law, the Comp Plan must commit the County to assist in achieving instream flow rules. The Plan will need to recognize that some constraints will be necessary to curb growth and groundwater use that continues to decrease adequate instream flows. How the Plan will provide for adequate water in towns needs to be clearly described.

Wildfire Protection: The Comp Plan must commit the County to require less-flammable materials in new construction, as well as adequate access for fire vehicles. Incentives should be provided to “firewise” homes and subdivisions, and primitive roads should be retained for fire escape routes and public land access.

Recreation: The Comp Plan must include a Recreation element that acknowledges the importance of recreation for citizens of the County, as well as its importance in supporting the tourist industry in many County areas.

Grading, Clearing, and Excavation (GCE): The Comp Plan must address the effects of the lack of a GCE ordinance (erosion, sedimentation, dust, etc.), and commit to adopting such an ordinance for Okanogan County.

Air Quality: The Comp Plan must address the effects of impaired air quality caused by wood stoves and open burning. By providing incentives for new construction to use other heat sources, and assisting in

the conversion of uncertified stoves to certified stoves or other sources of heat, the County can help improve air quality.

Ridgetop Development and Dark Skies: The Comp Plan should allow communities interested in adopting ridgetop development restrictions and Dark Skies practices to do so. The County could do this by adopting overlays for these communities.

Critical Areas Ordinance (CAO): Updated information on critical areas such as wetlands, aquifer recharge areas, fish and wildlife habitat, frequently flooded areas, and geological hazards, must be identified to adequately protect these important areas of the County. The comp plan should commit the County to updating the CAO within six months of adoption of the Comp Plan, and to amending the Shoreline Management Program and Comp Plan to be consistent with the revised CAO.

Fish and Wildlife Conservation: The Comp Plan must address the effects of climate change on fish and wildlife habitat. In addition, the county must commit to using best available science to adapt to these changes, and adopt policies that maintain the diversity and integrity of natural ecosystems in Okanogan County.

Draft Environmental Impact Statement (DEIS)

Unfortunately, the DEIS does not provide a clearly detailed and quantifiable analysis of the environmental impacts of the alternatives. In addition, the proposed fourth alternative (Citizens' Alternative), is not adequately analyzed. This is important as the fourth alternative and parts of Alternative 3, are the only alternatives that include the following necessary elements:

Concentrating most growth closer to towns, conserving water supplies and natural resources, protecting wildlife and migration corridors, promoting land uses that support local agriculture, encouraging resilience to wildfires and other impacts of climate change, creating different designations to minimize conflicts between residential and other Rural lands, and improving and enhancing recreational opportunities.

Thank you for the opportunity to comment on these important documents. I appreciate the dedicated work of the Planning Commission members in this critical process.

Sincerely,

DeeAnn Kirkpatrick
61 Quaking Aspen Road
Winthrop, WA 98862