

DATE: September 4, 2019

TO: Okanogan County Regional Planning Commission
Okanogan Planning Director, Courtney Ingle
123 Fifth Avenue North
Room # 130
Okanogan, Washington 98840

FROM: Dan Russell
POB 32
Carlton, Washington 98814

RE: Russell Comments for the Draft Comprehensive Plan and the DEIS

Dear Okanogan County Regional Planning Commissioners and Planning Director, Courtney Ingle,

As property owners in Carlton, Washington, my family and I reside on 7.75 acres where we raise cows, goats, pigs and chickens on our Seven Stars Farm which includes an additional 60 acres of leased, irrigated land. I hold a degree in Wildlife biology and have worked locally for the U.S. Forest Service, Washington Department of Fish and Wildlife, and the Yakima Indian Nation. Currently, I am the sole proprietor of two businesses, Russell's Blacksmith Shop and East Slope Farm and Forest.

After we survived the fierce and frightening devastation of the Carlton Complex wildfire which destroyed our trees, crops, fencing, and irrigation system, I earned certification in fire risk reduction which enables me to assist home owners with restoration and stewardship projects, preparing their property for post fire habitat improvement and fire protection. I am qualified to provide meaningful comments to be included in our county Comprehensive Plan. Many of my comments have been clearly articulated by the Methow Valley Citizens' Council which I have included below.

Comment #1: Title: Wildfire

Is it in the comp plan? Yes, but it does not include these recommendations.

Chapter 12 Natural Environment, page 48

Where should it be placed in comp plan? Chapter 12, Natural Environment. The references to escape routes might be added to the objectives for the Transportation Element (p. 35-39)

Objectives/Rationale: 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 homes, families and first responders is reduced.

Goal: (from existing Plan, p.48) To prioritize the protection of people, structures, infrastructure and unique ecosystems contributing to our way of life and the sustainability of the local and regional economy.

Policies: Existing narrative (p.48) can be reorganized into goals/policies, and these can be added:

- Adopt an appropriately scaled modification of the International Wildland Urban Interface Code, to address new subdivisions, new roads and building materials for 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, property, critical

areas and natural resources.

- 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, shall 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. *Also add this provision to Recreation or Transportation?

Implementation Measures: These policies will be implemented through the Zone Code, Subdivision Ordinance, Building Code, Transportation Element, Road Standards, All Hazards Mitigation Plan, Community Wildfire Protection Plan.

Comment # 2 Title: Fish and Wildlife Conservation

Is it in the comp plan? Yes it is, but incomplete. See Chapter 12-Natural Environment

Where should it be placed in comp plan? Chapter 12 or a new chapter. Fish and wildlife should also be mentioned in Chapter 3, which should be retitled "Water Resources"

New proposed language: Future changes in climate are expected to have significant impacts on fish and wildlife habitat important for intrinsic, cultural, subsistence, and economic purposes. These will include warmer and drier summers, lower summer stream flows, and more frequent and intense natural disturbances (e.g., wildfire, floods, landslides). Each of these changes will affect the plants and animals that county residents depend on for the health of their communities. Okanogan County will use best available science to adapt to these changes and adopt policies that maintain the diversity and integrity of natural ecosystems in Okanogan County.

Goals:

1. Identify and protect Critical Areas from adverse environmental impacts while providing for reasonable use of private property.
2. Maintain ecosystem function and ability of systems and habitats to migrate and function overtime.
3. Support RCW 17.10 purpose to limit economic loss and adverse effects to Washington's agriculture, natural, and human resources due to the presence and spread of noxious weeds on all terrestrial and aquatic areas in the State.

Policies:

(Goal 1)

- Classify, designate and protect all Critical Areas, including frequently flooded areas, wetlands, fish and wildlife habitat conservation areas, aquifer recharge areas and geologically hazardous areas using best available science, pursuant to RCW 36.70A.172 and WAC 365-190.

- Allow for open space and recreational use of Critical Areas where such use does not negatively impact them.

- Encourage the restoration and enhancement of Critical Areas.

- Encourage the use of innovative techniques to protect Critical Areas, such as purchase of development rights, transfer of development rights, clustering, conservation easements, land trusts, and the Public Benefit Rating System.

- In designating and protecting Critical Areas, the County shall use best available science to develop policies and development regulations. The County should also give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries.

- When reviewing development proposals, the County shall apply appropriate conditions to avoid or mitigate negative impacts to Critical Areas. Proposal review should also include evaluation of the cumulative impacts of

development proposals in Critical Areas.

(Goal 2)

- Support ongoing watershed planning efforts.
- Support and coordinate with efforts to restore and recover Threatened and Endangered fish and wildlife populations.
 - Protect water quality and fish habitat by requiring dredging and filling activities to minimize introduction of suspended solids, leaching of contaminants, or habitat disturbance.
 - Identify important wildlife migration corridors and encourage conservation easements, purchase by the Washington Department of Fish and Wildlife and others, to maintain habitat and open space for movements.
 - Focus growth near existing towns and already populated areas, avoid sprawl into areas bordering large open spaces.
 - Unless they are constructed to keep deer out (orchards/gardens), fences should be discouraged and where needed designed to allow easy passage by deer and other wildlife. There are specifications available.
 - Control dogs so they do not chase deer or other wildlife.
 - Keep roads to a minimum, in number, distance, and design, except as required for public safety, escape routes or recreation.
 - Restrict off-road vehicle traffic, especially snowmobiles, as much as possible to existing travel routes.

(Goal 3)

- Encourage the use and development of standards for using native and non-native adaptive plants and trees in landscape designs for public and private projects.
- Continue educating Okanogan County residents regarding problems caused by undesirable weeds and the benefits of controlling these weeds.
 - Manage weeds to reduce or eliminate the use of pesticides shown to harm the health of humans or beneficial insects.
 - Maintain control of undesirable weeds along county roadways, county parks and open space.
 - Complete and update the weed mapping of Okanogan County to include a record of control measures by the county, state, private and federal entities and the evaluation thereof.
 - Finish management plans for those private lands adjacent to county roadways.
 - Assist in implementation of management plans for State Parks, US forest lands and railroad lands.
 - Continue to develop management plans for private lands in Okanogan County with land owners.
 - Assist in implementation of cooperative management plans for towns and municipalities.

Implementation Measures:

Critical Areas Ordinance, Zone Code, Subdivision Ordinance, Building Code, Transportation Element, Road Standards, ATV Ordinance, Noxious Weed Control Board

Sincerely,



Dan Russell