

DATE: September 3, 2019

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

FROM: Linda Iribarren
POB 160
Carlton, Washington 98814

RE: Comments for the Draft Comprehensive Plan and the DEIS

Received
SEP 19 2019
Okanogan County
Planning and Development

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

For thirty years, my husband and I have owned and lived on twenty acres in Carlton, Washington. As a financial advisor to numerous business owners, I have traveled extensively to meet with clients throughout the Western states, even in Alaska. Particularly in rural communities, environmental degradation and pollution have negatively impacted lifestyles and natural wild lands. Fortunately, the Washington state Growth Management Act requires all counties to include a section on protection of Critical Areas in its Comprehensive Plan which is a very good idea. In order for all forms of life to meet their basic survival needs, it is essential that the critical areas of their ecosystem retain their natural condition and are well-protected.

I have carefully studied the comments about Critical Areas which were submitted by the of the Methow Valley Citizen's Council to the Okanogan County Planning Commissioners for inclusion in the 2019 Comprehensive Plan. Because I agree with MVCC comments, I have listed them as my comments below:

Comment #1: Critical Areas

Is it in the comp plan? Yes, in Chapter 12 Natural Environment.

However, it is disorganized, repetitive, incomplete and outdated. Needs to be restructured.

Background: The state Growth Management Act requires all counties, regardless of size, to include a section on protection of Critical Areas in its Comprehensive Plan. The Critical Areas Ordinance (CAO) and Shorelines Master Program (SMP) are key elements of environmental resource protection and must be reflected in the Comprehensive Plan.

Counties are also required to maintain a Critical Areas Ordinance (CAO) as part of county

code. Okanogan County's CAO was originally passed and approved in 1994, and two update mandates (2007 and 2018) have passed without the CAO changing to acknowledge current data, studies, and conditions.

The CAO must designate and protect the following areas and ecosystems:

Wetlands
Critical Aquifer Recharge areas, Fish and Wildlife habitat conservation,
Frequently flooded areas, Geologically hazardous areas.

Our recommendations address:

Including CAO and SMP in the Comp Plan; Critical Aquifer Recharge and Fish and Wildlife (separate policy brief)

Including CAO and SMP in the Comp Plan:

Goal: The Critical Areas Ordinance and Shoreline Master Program will inform and be informed by the Comprehensive Plan.

Policy:

- Okanogan County commits to updating the CAO within six months of the adoption of the comprehensive plan. The comprehensive plan will be then updated to reflect the CAO within six months of adoption of the CAO
- The Shoreline Master Program and Comprehensive Plan will be updated on a schedule to keep both documents current and consistent.

Critical Aquifer Recharge Areas/Water Quality:

Goals and Policies should be included in Chapter 3 (Retitle to Water Resources):

Goals:

- Groundwater is an important resource for drinking water throughout the county. Protecting these areas from contamination via On Site Septic (OSS) systems is a priority.
- Protect water quality of streams and lakes from pollution caused by inadequate or failing septic systems.

Policies:

- Okanogan County will review existing data and studies and designate critical aquifer recharge areas throughout the county. The County will rely on the maps provided by the US Geological Service (Golder Associates, 2003) to designate critical aquifers for the Methow Valley. (These maps are in the Methow Aquifer Study by Northwest Land and Water contained in Chapter 5, appendices of the draft comprehensive plan)
- The County will work with County Health Department to determine if (a) any upgrades are necessary for OSS criteria for new developments over critical aquifer recharge areas, and (b) any changes in zoning are necessary to accommodate OSS.

I look forward to reviewing the subsequent draft of the 2019 Okanogan Co.
Comprehensive Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Iribarren". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Linda Iribarren

