

Cortney Ingle

From: Tim Spelman <spelmantim@gmail.com>
Sent: Friday, September 06, 2019 11:38 AM
To: Cortney Ingle
Subject: Comments on the Okanogan County Comprehensive Plan

September 6, 2019

To Whom It May Concern -

As a property owner on Finley Canyon Road within the County south of Twisp, I strongly object to the Draft Comprehensive Plan and Draft Environmental Impact Study as currently composed. At the present time, I and my neighbors are faced with a proposal to interject a 600-acre gravel quarry as a conditional use within our residential neighborhood of 20-acre rural zoning. I am not objecting to the plan to increase gravel production within the County - we all need and use gravel. The issue is that not only a gravel pit but also an asphalt batch plant, explosives factory and a petroleum bulk plant can be approved in our neighborhood by the conditional use process. None of these industrial uses should be located so as to destroy the quality of life of a residential community. We will continue to oppose this project and have concluded that a strong comprehensive plan never would have allowed this proposal to reach this point.

Major Problems with the Comp Plan and DEIS as proposed

- The Plan **fails to meet the basic standards required by law and fails to clearly articulate the differences between alternatives**. One example is the failure to provide a Land Use Element, which guides future zoning and permitting across the county. **A Plan that does not meet legal requirements leads to a waste of county resources** (and precious time) on unnecessary legal actions.
- The Comprehensive Plan and DEIS are **not organized in a way that allows for a meaningful analysis of the impacts of the alternatives presented - and lacks any meaningful analysis of the proposed fourth alternative (Citizens' Alternative)**. As presented, the DEIS is not a helpful tool for decision-making.
- The Plan was drafted by the same individual who has failed to produce a legally defensible or adequate Plan for the county for over a decade. That individual resigned after releasing the inadequate DEIS: **it's time to start fresh and create a new legacy**.
- There are **no protections for people and property from wildfires**, the draft Plan just calls for more studies and updates.
- The Plan **does not deal adequately with the need for sub-area planning**, in the Methow valley or elsewhere.
- The Plan provides **inadequate provisions to protect water quantity including senior water rights holders**, farms and ranches, fish and wildlife, and recreation.
- The Plan is **inconsistent with the instream flow rules for watersheds in the county- and state law**.
- The Plan provides **inadequate protections for working farms and forests**.
- The Plan provides **inadequate protections from natural hazards such as landslides**.
- There is **no Economic Development element**.
- The Plan **does not adequately address Recreation** as a critical element of the county's economy.
- The Plan is **not integrated with the county road system**, so planned development will either cost taxpayer's money to resolve safety and capacity problems or leave the problems unaddressed.

What I Support

The Draft Comp Plan in its current form is insufficient and **does not address the issues raised by the public during Scoping**. The DEIS does not adequately compare alternatives. From what we can infer from the documents provided, **parts of Alternatives 3 and 4, though incomplete in the DEIS, are the most viable approaches** because they:

- Concentrate most **growth closer to towns**
- Take a **conservative approach to addressing water supplies**
- **Conserve natural resources** and promote land uses that **support local agriculture**
- **Encourage resilience to wildfires and other impacts of climate change**
- **Protect wildlife and migration corridors** and consider our important mule deer population
- **Minimize conflict between residential and other uses of Rural lands** by creating different designations
- **improve and enhance recreational opportunities**

I support:

- **Sub-area planning, guided by local advisory committees**, that recognizes the unique culture and geography of our large county.
- **Including the entire Methow Watershed** within the Methow Valley More Completely Planned Area (MVMCPA)
- **Including the measures provided** related to issue briefs to address specific issues important to our communities.

In addition, the existing Comp Plan has not and the proposed Comp Plan will not adequately address the planning and decision-making related to Rural Uses. This shortcoming has allowed the proposal of a highly inappropriate gravel quarry within my neighborhood.

What’s the problem with Rural Designations in the Comp Plan?

- There is no Land Use Element to play the central role in guiding land use patterns and decisions for the County
- There is only one Rural designation that refers everything at a project-specific level back to “underlying zoning.” In most cases, “underlying zoning” is merely a minimum acreage, with no reference to the characteristics of the area (e.g. residential, industrial, range lands) or distinction between allowed uses – everything is allowed everywhere in the Rural designation, unless someone decides at a site level that it shouldn’t be, which rarely happens. This has led over time to incompatible uses being sited adjacent to one another with resulting community stress. **Examples:** Cannabis farms across the county; **Gravel pits** and party venues sited in rural neighborhoods.

Where should it be placed in comp plan? Chapter 5. It could be retitled Rural and Resource Lands and contain goals and policies for both.

There should also be a general planning goal to support planning that minimizes siting of incompatible uses. Lines 408-411 are a good place to start but the current Plan only protects Agriculture from incompatible uses.

New proposed language:

Objectives/Rationale:

Rather than rely heavily on zoning for guidance, we recommend policies in the Comprehensive Plan that apply to each Rural land use designation, its intent, the densities and types of uses allowed, and criteria for applying the designation to specific areas. It should provide clear policy guidance for development of the implementing regulations (e.g. zoning)

Goal (General): 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 values.

Policies:

- 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 propose 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.

In conclusion, I recommend that the county hire a qualified professional to assist in drafting the final Plan and Final Environmental Impact Statement - not the same person the county recruits to take the place of the former Planning Director: the job is too large and complex to be accomplished in a reasonable time frame by one person.

Thank you for allowing me this opportunity to comment on the proposed Comp Plan and DEIS. I hope you will take this opportunity to reconsider the document that has been produced to date. Now is the time to get the process right.

Sincerely yours,

Timothy Spelman

120 Finley Canyon Road

Twisp, WA 98856

206 850 5533

spelmantim@gmail.com