

## Cortney Ingle

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**From:** Jones, Thomas M. <TJones@cozen.com>  
**Sent:** Friday, September 13, 2019 11:21 AM  
**To:** Cortney Ingle  
**Cc:** Jones, Thomas M.  
**Subject:** Comment - Comprehensive Plan and Draft Environmental Impact Statement  
**Attachments:** T. Jones Comment - Comp Plan and Draft EIS.pdf

*This Comment is sent on behalf of Thomas M. Jones.*



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**September 13, 2019**

**Via email: [cingle@co.okanogan.wa.us](mailto:cingle@co.okanogan.wa.us)**

Ms. Ingle and Planning Commission  
Okanogan County  
123 5<sup>th</sup> Avenue North, Suite 130  
Okanogan, WA 98840

**Comment Deadline: 5pm, Thursday September 19**

**Dear Ms. Ingle and Planning Commission:**

Thank you for extending the comment period for the Okanogan County Comprehensive Plan and Draft Environmental Impact Statement. While the Comp Plan revision is greatly overdue, it is more important to get it right this time than to rush through with a deficient document, which is where it now stands.

**Comments:**

**Draft Environmental Impact Statement (DEIS):**

Although there is some good information for planning in the document, the DEIS is not helpful in examining the relative environmental impacts of the alternatives. It is impossible to compare the environmental impacts of the alternatives because the information for both is vague or unquantified. Thus, the DEIS fails to do its job, which is to help the public and decision makers come to an informed decision as to the merits of the alternatives. However, I would rather see scarce County resources go to improving the Comp Plan than doing a major overhaul of the DEIS.

**Comp Plan:**

The draft comp plan is disorganized and nearly incomprehensible. For example, there is no Land Use Element as required, and land use discussions are spread throughout the draft with little or no coherence. There are some salvageable elements in the draft, but the document is notable more for what it does not say than what it does say.

I would like to add my voice to those calling for an experienced professional consultant to both reorganize and add substance to the draft, after the Planning Commission has reviewed public input and provided adequate guidance to inform a new draft. Some elements of Alternative 3 plus the bulk of Alternative 4 could be combined to produce a legally defensible and acceptable comp plan.

**Specifically, the draft comp plan is silent or vague in dealing with the following elements:**

**Water:** The Comp Plan fails to commit to assist in achieving instream flow rules as required by law. This requires acknowledging that excessive growth and use of groundwater will have a detrimental affect on instream flows, which are not now being met and will only get worse without some constraints. While the draft acknowledges the need to ensure adequate water for towns and urban growth areas, it is vague on how that will be accomplished. The comp plan needs to be more specific on what incentives will be provided to prevent sale of water rights to buyers outside of the County.

**Grading, Clearing, and Excavation (GCE):** The comp plan is silent in dealing with the impacts of GCE on erosion, sedimentation, and dust from unregulated GCE. Furthermore, a GCE ordinance could be a means of ensuring that new roads and driveways are adequate for fire vehicles. Okanogan County is one of the few in the state without a GCE ordinance and the Comp Plan is the logical place to commit to such an ordinance.

**Wildfire:** The comp plan fails to commit the County to require less-flammable materials in new construction. While the right to build a home with flammable materials is valued by some, such decisions affect us all. These homes are fuel which accelerate the spread of wildfire, thus endangering neighbors and firefighters.

**Air Quality:** The Comp Plan is silent on the role of wood stoves and open burning on air quality, even though both the Okanogan and Methow Valleys suffer from poor air quality, especially in the winter. The County can assist in improving air quality by providing incentives for new homes to heat with sources other than wood, and by assisting in the conversion of uncertified stoves to certified stoves or other sources of heat.

**Recreation:** Again, the comp plan is nearly silent on recreation, a required element pursuant to the Planning Enabling Act. The County can play a key role in preserving and enhancing recreational opportunities through direct support and in a coordinating role in encouraging open space, trails, and the like. The comp plan needs to reflect the importance of recreation to the enjoyment of its citizens the economy.

**Ridgetop development and Dark Skies:** The comp plan should recognize that some communities wish to adopt ridgetop development restrictions and Dark Skies practices, while others may not. For those communities that wish such restrictions, the County should commit to adopting overlays to carry out the wishes of the communities. In some instances, there is a safety component of ridgetop development that should be considered during permitting.

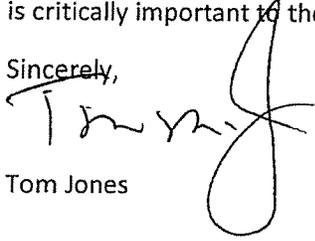
**Critical Areas Ordinance (CAO):** Okanogan County is relying on the 1994 CAO, which is grossly deficient having missed two mandated updates. How can critical areas such as wetland, aquifer recharge areas, fish and wildlife habitat, frequently flooded areas, and geological hazards be protected (and protected

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from) if not identified and designated using the latest information? 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 as necessary

In closing, I would like to thank the volunteers for their service on the Planning Commission. Your work is critically important to the future of Okanogan County.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Jones". The signature is stylized with a large, looping flourish at the end.

Tom Jones