

Cortney Ingle

From: Kevan Coffey <kevan.coffey@gmail.com>
Sent: Sunday, September 15, 2019 1:42 PM
To: Cortney Ingle
Subject: Comments on the Comp Plan

Dear Ms. Ingle and Planning Commission:

Thank you for extending the comment period for the Okanogan County Comprehensive Plan and Draft Environmental Impact Statement. It is my understanding that the current plan is deficient in many areas. I am hopeful that the Planning Commission will take this opportunity to develop a more thoughtful, nuanced and truly "comprehensive" plan to guide the future of our county. I encourage you to review the sub-area vision statements that citizens from all over the county developed several years ago. Sub-area planning, guided by local advisory committees, is a way to integrate and recognize the unique cultures and needs of communities across our large county.

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 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. 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 planner, someone who is trained in land-use planning, to both reorganize and add substance to the 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: I encourage you to incorporate the latest climate science as you make decision and projections about the future of water use in our county. 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. It should focus on conserving natural resources, especially water, in ways that allow local small scale farms to thrive. Local food production is going to become increasingly important in the future.

--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 and the economy.

--Air Quality: The Comp Plan is silent on the role of wood stoves and open burning on air quality, despite the fact that both the Okanogan and Methow Valley's 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.

--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.

--Ridge-top development and Dark Skies: The comp plan should recognize that some communities wish to adopt ridge-top development restrictions and Dark Skies practices, while other may not. For those communities that wish such restrictions, the County should commit to adopting ordinances to carry out the wishes of the communities.

--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 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,

Kevan Coffey

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9/15/19