

Ben Rough
Senior Planner
Okanogan Planning Dept.
123 Fifth Ave.
Okanogan, WA 98840

Subject: Comments and suggestions for scoping on the Zoning Ordinance EIS

Since the Comprehensive Plan and the proposed Zoning Ordinance are inextricably linked, and the Plan is now under appeal re the necessity for an EIS, it would be prudent to wait till this issue is resolved before proceeding with the zoning EIS.

Density and Uses

Although "limited population growth and dispersed nature of development" is cited as a rationale for the allowed densities and uses, it is not based on the actual facts of present land ownership throughout the county. Thousands of acres are now owned by land speculators and realty companies, most from outside the area. Although much of this land is now mistakenly in Agricultural or Forest open space for tax purposes, the reality is it has been exempt segregated and boundary line adjusted, with the approval of the county planning dept., and usually without any environmental review, into lots as small as one or two acres. The many short plats approved also indicate a predisposition of the owners as to development.

Given the county's track record in allowing developments in areas where water supply, transportation, fire and flooding, and other impacts are predictable, and given the lawsuits that citizens have had to file to reverse county planning decisions, it is questionable whether the "project review and development controls in place" will offer any protection from the cumulative impacts of the development allowed under the comprehensive plan or the accompanying zoning ordinance. When, for example, the SFI corporation begins to develop its several thousand acres just east of the town of Tonasket, how will the county be able to regulate, based on the current zoning?

Zoning ordinance scoping needs to honestly consider the impacts that these parcels, when developed, will have on the county's environment and resources.

Effects of the "High-density Rural" designation

The designation of a "rural" high-density is in itself an oxymoron; especially when the actual dwellings can be two, thus making "rural" down to 1/2 acre. As well, these so-called "rural" parcels will be permitted all sorts of uses that have nothing to do with protecting the rural quality of life. This is not the rural definition that the citizens of the county put forth in the many planning sessions they attended both in 2008-09 and even earlier in the 1990's. If we had wanted or expected a rural lifestyle when living here, the county powers seem to ignore that message. In addition, in order to show the full impacts of the high-density rural zoning as it actually translates on the land, the EIS should include maps that show what a build-out of all one-acre lots will look like. There are currently GIS software programs that can extrapolate from the data to project this kind of mapping and will give a graphic portrayal of what the land will look like under this. The current zoning map does not show the actual on the ground effect in the necessary detail.

The rest of the county is in low-density rural (another mis-nomer) and also requires that a graphic portrayal be provided in order to get the full impact.

We propose also that the scoping include an alternative that expresses the wishes of the citizens as exemplified in the earlier planning process and which was included in one of the first drafts of the plan and then later, upon pressure from powerful interest groups, eliminated.

Agricultural Resource Lands

A serious deficiency in the comp. Plan and the zoning ordinance is the lack of any agricultural resource lands designation. Although the public lands and a few select areas such as the upper Methow and Molson overlay do designate 20 acre zoning, most of the county's most productive ag lands, as well as the upland drylands are zoned for 5 acre "rural" low density. Futurewise representative Tim Trohimovich in his 1-29-15 comments to the county's Comp. Plan, states that the count is "failing to properly designate agricultural, forest, and mineral lands of long-term commercial significance as required under RCW 36.70 A.170(1). He recommends a 40 acre minimum lot size to protect both agricultural and forest resources landk especially lands currently used for dryland grazing. Ranchers depend on these large parcels, many now in ag open space. Already many of these have divided into 20 acre parcels, no doubt in anticipation of conversion to residential and recreational development. The 5 acre zoning provision will make such parcelization even easier. Recent fires have shown how many of these 2nd homesites, mostly mobile homes, are scattered over the landscape.

We recommend that the EIS include an alternative based on Futurewise's analysis and recommendations. This alternative should identify all remaining open space resource land ,showing how many viable acres remain that could be protected by the type of zoning recommended by Futurewise.

Adequate water supplies

The current zoning plan also fails to factor in the serious water shortages throughout the county and how climate change and fires will affect water supplies even further. The Okanogan watershed plan for example identifies the Tunk valley as short of water, yet no provision is made in the plan and the one-size fits all zoning is applied irregardless. The valley suffered serious fire damage this summer, with inadequate water supplies to fight the blazes, yet this too is being ignored. Another environmental factor is floodplains. Damage in floodplains has been documented, yet the county still allows structures under the current ordinance.

Analyzing both worst case and best case scenarios in the EIS will make it easier to see the impacts and costs of the current zoning ordinance and how it can be significantly improved to reflect the realities of land use and legal requirements. Perhaps this information will move planners, their cohorts, and the county commissioners, to see the deficiencies in the current plan and zoning ordinance and correct them accordingly?

Jessica McNamara

1177 Pine Creek Rd.
Tonasket, WA 98855

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