

To: Perry Houston, Director of Planning and Rocky Robbins, Planner I
Okanogan County Office of Planning and Development
From: Nancy Farr *Nancy Farr*
Winthrop, WA
Date: January 14, 2019

Subject: Comprehensive Plan & Zoning Requirements EIS Scoping Comments

Thank you for this opportunity to provide input on the land use factors that should be evaluated in the impact analysis of the alternatives proposed to underlay the new Okanogan County Comprehensive Plan and Zoning regulations.

Our county government in its plans, commitments, decisions and actions should utilize the "precautionary principle" when dealing with matters – such as Comprehensive Plans – that will have long-range, far-reaching impacts. The component of the precautionary principle that is relevant to the county Comp Plan and Zoning regulations is the guideline to "take preventive action in the face of uncertainty." Certainly the magnitude of risks to the County's people, assets and economy from Climate Change and Wildfire, for example, are uncertain. However, there is ample evidence pointing to the likelihood of significant risk from both sources, necessitating serious consideration of their potential impacts in all planning and zoning decisions. Investigative reporting in California has uncovered ample evidence that the precautionary principle was ignored by Paradise and Butte County government staff and officials.

I want to commend to County Planning the Alternative 4 proposed by the Methow Valley Citizens Council. I feel strongly that every section and specific element proposed in Alternative 4 for the updated Comp Plan and Zoning regulations is critical to our shared future in Okanogan County.

In particular, I want to focus attention on the Alternative 4 Wildfire Protection section with these additional comments:

- Adopt an appropriately scaled modification of the International WUI Code
Please look at Chelan County's recently adopted WUI Code for a relevant model. We need strong building codes for both fire resistance and energy efficiency. In addition to building requirements, Okanogan County's WUI Code should address "Firewise" landscape maintenance requirements and enforcement, including the ability for private citizens to request the County to intervene in the case of unmaintained properties (e.g. a "nuisance code").
- Support programs providing incentives to 'harden' existing homes
The Okanogan Conservation District can be an excellent partner for the County for education and assistance in this area.
- Update the badly out-of-date Community Wildfire Protection Plan with meaningful planned actions and financial assistance to enable implementation.
This is an obvious necessity.
- Drastically limit density in areas with one-lane roads or only one way in and out.
This is a serious precaution for protecting life and assets of both fire fighters and property owners, residents and visitors.
- Reserve for public use all primitive and remote gravel road rights of way.
This is essential for emergency public egress and fire fighting access to residences and to our valuable public and habitat lands.

And of course water availability protections must be mutually supportive of wildfire protections.